



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

7/11/2016

Certified Mail

Larry Waite  
Miami Fort Power Station  
1500 Eastport Plaza Drive  
Collinsville, IL 62234

Facility ID: 1431350093  
Permit Number: P0099746  
County: Hamilton

RE: DRAFT AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice, the Statement of Basis, 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 Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219

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 if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*  
SWOAQA; Indiana; Kentucky



## 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 Title V Permit Renewal

#### Miami Fort Power Station

11021 Brower Road, P. O. Box 128, North Bend, OH 45052-0128

ID#: P0099746

Date of Action: 7/11/2016

Permit Desc: Title V renewal permit for the Dynegy Miami Fort utility power generating station, which includes two pulverized coal-fired boilers, four combustion turbine peaking units, and multiple fugitive dust sources..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the ID # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777





**Statement of Basis**  
 Miami Fort Power Station  
**Permit Number:** P0099746  
**Facility ID:** 1431350093

## Statement of Basis For Air Pollution Title V Permit

Facility ID:	1431350093
Facility Name:	Miami Fort Power Station
Facility Description:	Electric Power Generating Station
Facility Address:	11021 Brower Road, North Bend, OH 45052-0128
Permit #:	P0099746, Renewal
<p>This facility is subject to Title V because it is major for:</p> <p> <input type="checkbox"/> Lead            <input checked="" type="checkbox"/> Sulfur Dioxide            <input checked="" type="checkbox"/> Carbon Monoxide            <input checked="" type="checkbox"/> Volatile Organic Compounds            <input checked="" type="checkbox"/> Nitrogen Oxides  <input checked="" type="checkbox"/> Particulate Matter 10 microns            <input checked="" type="checkbox"/> Single Hazardous Air Pollutant            <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants  <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s)            <input checked="" type="checkbox"/> GHG            <input checked="" type="checkbox"/> Title IV       </p>	

### A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes. The insignificant emissions units (IEUs) that have applicable state and/or federally-enforceable requirements are included in the terms and conditions in Section B. All other IEUs at this facility are excluded from the requirements to obtain installation or operating permits pursuant to OAC rules 3745-15-05 and 3745-31-03 and have no applicable federally enforceable requirements; therefore, these IEUs are not included in the terms and conditions of this permit pursuant to OAC rule 3745-77-07(A)(13).
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit	N/A



document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	<p>The permit renewal incorporates a number of PTIs and PTI modifications issued since the prior 2003 Title V issuance for installation of a flue gas desulfurization system and associated fugitive dust sources and these PTIs are identified in the terms and conditions of each emissions unit. This renewal also includes additional federal rules, including 40 CFR Part 63, Subpart UUUUU and Subpart DDDDD that have become applicable since the prior Title V permit action. This Title V renewal action also includes reference in Section B to the Cross-State Air Pollution Rule (CSAPR)/Transportation Rule (TR) which has also become applicable since the prior Title V permit action. Emissions unit B007, a 1534 MMBtu/hour pulverized coal-fired boiler identified as Unit #6, is located onsite but has been removed from operational service effective 6/1/2015 under the terms and conditions of a compliance deadline extension request granted by Ohio EPA on 12/12/2013 for 40 CFR Part 63, Subpart UUUUU. The permittee elected to remove emissions unit B007 from service in lieu of complying with 40 CFR Part 63, Subpart UUUUU, therefore this EU is not including in this Title V Operating Permit renewal action. The permittee is required to submit an application for, and obtain final approval of, a Title V permit modification, permit to install modification, and compliance plan, as applicable, prior to returning EU B007 into service.</p>
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	<p>A CAM Plan may be required for emissions units B015 and B016 based on potential pre-control device emissions of particulate that are greater than 100 TPY. However, the particulate emissions and/or control devices employed to reduce particulate emissions may be subject to the listed NESHAP Subpart UUUUU regulations if the permittee elects the particulate emission limitation option in the MACT rule, and therefore, exempt from CAM requirements.</p> <p>Otherwise, CAM is applicable to these sources since the emissions unit must comply with an applicable particulate emission limitation under OAC rules. This CAM and MACT applicability issue is clarified in the terms and conditions of the permit for emissions units B015 and B016.</p>



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

Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
B.2.	77-07(A)(13)	N	Listing of insignificant emissions units that are subject to SIP-approved and/or federal regulations.
B.3.	77-07(A)(13) 3745-31-03		Listing of insignificant emissions units that are subject to SIP-approved permit-by-rule exemption requirements.
B.4.	-25	N	Clarifying and reference term for rule applicability determination for air quality emergency episodes.
B.5.	-20	40 CFR 61, Subpart M	Clarifying and reference term for rule applicability determination for asbestos demolition and renovation activities.
B.6., B.7., B.10.	N	40 CFR Part 63	Clarifying and reference terms for rule applicability determination regarding emissions units contained in the permit subject to National Emission Standards for Hazardous Air Pollutants (NESHAP).
B.8., B.9.	N	40 CFR Part 60	Clarifying and reference terms for rule applicability determination regarding emissions units contained in the permit subject to New Source Performance Standards (NSPS).
B.11.	N	40 CFR Part 64	Clarifying term for emissions units that are subject to the Compliance Assurance Monitoring (CAM) rules in 40 CFR Part 64. Emissions units B015 and B016 may be subject to CAM based upon the uncontrolled potential to emit for particulate, unless the permittee elects to comply with the particulate limitation and associated monitoring requirements in 40 CFR Part 63, Subpart UUUUU.
B.12.	-103	40 CFR Part 72 and 75	Clarifying and reference term for emissions units that are subject to the Acid Rain Rules in 40 CFR Part 72, Part 75, and OAC Chapter 3745-103.
B.13.	-109	N	Terms and conditions for emissions units located at the facility subject to the Clean Air Interstate Rule (CAIR) and any subsequent federal programs.
B.14.	N	40 CFR Part 97	Terms and conditions for emissions units located at the facility subject to the Cross-State Air Pollution Rule (CSAPR)/Transportation Rule (TR). Emissions units B015 and B016 are subject to CSAPR.



### C. Emissions Unit Terms and Conditions

Key:	
EU = emissions unit ID	R = record keeping requirements
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)	Rp = reporting requirements
OR = operational restriction	ET = emission testing requirements (not including compliance method terms)
M = monitoring requirements	St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?	Misc = miscellaneous requirements



**Statement of Basis**  
 Miami Fort Power Station  
 Permit Number: P0099746  
 Facility ID: 1431350093

U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
B015	SO <sub>2</sub> emissions shall not exceed 5.5 lbs/MMBtu	18-37(BB)(5)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.
B015 B016	See 40 CFR 63.9991 and Table 2 for applicable limitations for existing coal-fired EGUs (not using low rank virgin coal), constructed prior to 5/3/2011.	N	40 CFR Part 63, Subpart UUUUU	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
B015 B016	Compliance Assurance Monitoring (CAM)	N	40 CFR Part 64	N	N	Y	N	Y	Y	Y	N	N	Permit terms and conditions identify opacity as CAM Plan indicator to assure compliance with particulate (PE) limitation.
B016	SO <sub>2</sub> emissions shall not exceed 1.2	18-37(BB)(6)	40 CFR 60, Subpart D	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	lbs/MMBtu												to determine compliance.
B016	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,  Visible particulate emissions shall not exceed 20% opacity as 6-min avg, except for one 6-min period per hour of not more than 27%	17-07(A)(1)	40 CFR 60, Subpart D	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B016	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	40 CFR 60, Subpart D	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
B016	NO <sub>x</sub> shall not exceed 0.70 lb/MMBtu	N	40 CFR 60, Subpart D	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for NO <sub>x</sub> ; therefore no stack testing is required to determine compliance.
F001	PE shall not exceed 3.58 lbs/hr and 15.69 TPY; PM <sub>10</sub> and PM <sub>2.5</sub> shall not exceed 1.81 lbs/hr and 7.94 TPY.	N	OAC 3745-31-05(A)(3) (PTI 14-05762, issued 11/17/05)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emission limitations reflect the emissions unit's potential to emit at the maximum hourly process rates, using AP-42 emission factors, and assuming 8,760 hours per year operation. Therefore, no M, R, Rp, or ET is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
F001	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-min avg.	17-07(B)(7)(b)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
													with the opacity limitations in accordance with Method 9 procedures since the applicable compliance method under the OAC rules and underlying PTI is Method 9, as specified in the testing terms.
F001	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.
F001	Exhaust gases from any coal processing and conveying equipment, coal storage system or coal transfer and loading system gases less than 20% opacity	N	40 CFR 60, Subpart Y	N	N	Y	N	Y	Y	Y	N	N	
F002	Visible particulate	17-07(B)(7)(b)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require dust control inspections



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		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	emissions from load-in and load-out on coal piles shall not exceed 20% opacity as a 3-min avg.												(operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitations in accordance with Method 9 procedures since the applicable compliance method under the OAC rules is Method 9, as specified in the testing terms.
F002	Visible particulate emissions from vehicle operation on top of coal piles shall not exceed 20% opacity as a 3-min avg.	17-07(B)(7)(c)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitations in accordance with Method 9 procedures since the applicable compliance method under the OAC rules is Method 9, as specified in the



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
													testing terms.
F002	There shall be no visible particulate emissions from any coal pile due to wind erosion, except for a period of 13 mins during any 60-min period	17-07(B)(7)(d)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitation in accordance with Method 22 procedures since the applicable compliance method under the OAC rules is Method 22, as specified in the testing terms.
F002	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.
F003 F007	No visible particulate emissions from any paved road or	17-07(B)(7)(a)(ii)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require daily dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	parking area, except for a period of 6 mins during any 60-min period; No visible particulate emissions from any unpaved road or parking area, except for a period of 13 mins during any 60-min period												visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitation in accordance with Method 22 procedures since the applicable compliance method under the OAC rules is Method 22, as specified in the testing terms.
F003 F007	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.
F004	Visible particulate emissions shall not exceed 20% opacity as a 3-min avg from any matl handling operation	17-07(B)(7)(b)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
													OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitations in accordance with Method 9 procedures since the applicable compliance method under the OAC rules is Method 9, as specified in the testing terms.
F004	Visible particulate emissions shall not exceed 20% opacity as a 3-min avg. from wind erosion on basins	17-07(B)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitations in accordance with Method 9 procedures since the applicable compliance method under the OAC rules is Method 9, as specified in the testing terms.
F004	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.



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		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
F005	PE shall not exceed 10.43 lbs/hr and 5.22 TPY; PM <sub>10</sub> shall not exceed 4.94 lbs/hr and 2.47 TPY.	N	OAC 3745-31-05(A)(3)  (PTI 14-05010, issued 9/18/01)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emission limitations reflect the emissions unit's potential to emit at the maximum flyash generation rate and maximum material handling capacity of the equipment, using AP-42 emission factors. Therefore, no M, R, Rp, or ET is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
F005 F006	Visible particulate emissions from the stacks (baghouses) shall not exceed 20% opacity, as a 6-min avg.	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require daily control device (baghouse) inspections as indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the control device inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitations in accordance with Method 9 procedures since the applicable compliance method under the OAC rules is Method 9, as specified in the testing terms.



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		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
F005 F006	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-min avg from any matl handling operation	17-07(B)(7)(b)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require daily dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitations in accordance with Method 9 procedures since the applicable compliance method under the OAC rules is Method 9, as specified in the testing terms.
F005 F006	PE shall not exceed 0.03 gr/dscf from baghouse(s)	17-08(B)(3)	N	N	N	Y	N	Y	Y	N	N	N	ET: Pursuant to Ohio EPA Engineering Guide #16, no emissions testing is specifically required based upon the annual allowable emission rate (<100 TPY) and actual emissions of these sources (<1 TPY). The results of the monitoring, record keeping, and reporting (M, R, Rp) from the visible emissions checks and pressure drop monitoring of the control devices (baghouses) will be used as an indicator of potential noncompliance. If appropriate, and when required in



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		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
													accordance with OAC rule 3745-15-04(A) based upon M, R, Rp results, compliance shall be demonstrated by conducting emissions tests in accordance with Method 5.
F006	PE shall not exceed 0.79 lb/hr and 0.32 TPY; PM <sub>10</sub> shall not exceed 0.36 lb/hr and 0.15 TPY.	N	OAC 3745-31-05(A)(3) (PTI 14-05189, issued 8/30/01)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emission limitations reflect the emissions unit's potential to emit at the maximum flyash generation rate and maximum material handling capacity of the equipment, using AP-42 emission factors. Therefore, no M, R, Rp, or ET is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
F007	No visible particulate emissions, except for 1 min during any 60-min period (paved roadways)	N	OAC 3745-31-05(A)(3) (PTI P0107421, issued 5/26/2011)	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require daily dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	No visible particulate emissions, except for 3 min during any 60-min period (unpaved roadways)  Employ best available control measures for fugitive dust												required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitation in accordance with Method 22 procedures since the applicable compliance method under the OAC rules is Method 22, as specified in the testing terms.  All requirements for this EU have been transferred from the PTI.
F007	PE from the paved roadways shall not exceed 10.18 TPY.  PM <sub>10</sub> emissions from the paved roadways shall not exceed 2.83 TPY.  PM <sub>2.5</sub> emissions from the paved roadways	N	OAC 3745-31-05(D) (PTI P0107421, issued 5/26/2011)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by record keeping of vehicle miles traveled and the record keeping of monthly emissions calculated using AP-42 emission factors and control efficiencies for the control measures employed.  These annual emission limitations are bottlenecked due to the federally-enforceable limitations on material throughput for emissions unit F009 and F010; therefore these limits represent the potential to emit.



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	shall not exceed 0.50 TPY (from temporary gypsum storage pile handling and transport roadways).  PE from the unpaved roadways shall not exceed 8.15 TPY.  PM <sub>10</sub> emissions from the unpaved roadways shall not exceed 2.34 TPY.  PM <sub>2.5</sub> emissions from the unpaved roadways shall not exceed 0.31 TPY												All requirements for this EU have been transferred from the PTI.



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	(from temporary gypsum storage pile handling and transport roadways).												
F008	No visible particulate emissions, except for 1 min during any 60-min period  Employ best available control measures for fugitive dust	N	OAC 3745-31-05(A)(3) (PTI P0107421, issued 5/26/2011)	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require daily dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitation in accordance with Method 22 procedures since the applicable compliance method under the OAC rules is Method 22, as specified in the testing terms.  All requirements for this EU have been transferred from the PTI.
F008	PE from the material handling system	N	OAC 3745-31-05(D)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by record keeping of monthly emissions calculated using AP-42 emission



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	<p>storage piles - load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 1.48 TPY.</p> <p>PM<sub>10</sub> emissions from the material handling system storage piles - load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 0.76 TPY.</p> <p>PM<sub>2.5</sub> emissions from the material handling system storage piles</p>		(PTI P0107421, issued 5/26/2011)										<p>factors and control efficiencies for the control measures employed.</p> <p>These annual emission limitations are bottlenecked due to the federally-enforceable limitations on material throughput for emissions unit F009 and F010; therefore these limits represent the potential to emit.</p> <p>All requirements for this EU have been transferred from the PTI.</p>



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	- load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 0.20 TPY (from temporary gypsum storage piles handling, load-in, load-out and wind erosion).												
F008	There shall be no visible particulate emissions from the matl storage piles due to wind erosion, except for a period of 13 mins during any 60-min period	17-07(B)(6)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require daily dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitation in accordance with Method 22 procedures since the



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
													applicable compliance method under the OAC rules is Method 22, as specified in the testing terms.
F008	Visible particulate emissions for load-in or load-out from any matl storage pile shall not exceed 20% opacity as a 3-min avg	17-07(B)(7)(b)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require daily dust control inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitations in accordance with Method 9 procedures since the applicable compliance method under the OAC rules is Method 9, as specified in the testing terms.
F008 F010	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.
F009	PE shall not exceed	N	OAC 3745-31-	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly emission limitations reflect



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		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	30.13 lbs/hr; PM <sub>10</sub> shall not exceed 22.89 lbs/hr.		05(A)(3)  (PTI 14-05585, issued 10/21/04)										the emissions unit's potential to emit at the maximum material handling capacity of the equipment, using fugitive particulate AP-42 emission factors. Therefore, no M, R, Rp, or ET is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
F009	PE shall not exceed 9.02 TPY as rolling, 12-mo summation;  PM <sub>10</sub> shall not exceed 8.03 TPY as rolling, 12-mo summation.	N	OAC 3745-31-05(D)  (PTI 14-05585, issued 10/21/04)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on maximum material throughput per year to demonstrate compliance with emission limitations.  ET: Compliance is determined by monitoring, record keeping, and reporting requirements and the control efficiencies and fugitive particulate emission factors found in AP-42.  All requirements for this EU have been transferred from the PTI.
F009	Visible particulate	17-07(B)(7)(b)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require daily dust control



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		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	emissions of fugitive dust shall not exceed 20% opacity as a 3-min avg from any matl handling operation												inspections (operations assessments) as an indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitation in accordance with Method 9 procedures since the applicable compliance method under the OAC rules is Method 9, as specified in the testing terms.
F009	Employ best available control measures for fugitive dust	N	OAC 3745-31-05(A)(3) (PTI 14-05585, issued 10/21/04)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.  All requirements for this EU have been transferred from the PTI.
F010	PE from the material handling system, transfer and	N	OAC 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly emission limitations reflect the emissions unit's potential to emit at the maximum material handling capacity of the equipment, using



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	conveying - gypsum handling system shall not exceed 0.61 pound per hour.  PM <sub>10</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.34 pound per hour.  PM <sub>2.5</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.02pound per hour (from temporary		(PTI P0107421, issued 5/26/2011)										fugitive particulate AP-42 emission factors. Therefore, no M, R, Rp, or ET is required to determine compliance.  All requirements for this EU have been transferred from the PTI.



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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	gypsum material handling system, transfer and conveying - gypsum handling)												
F010	PE from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.66 TPY, as 12-mo rolling summation  PM <sub>10</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.40 TPY, as 12-mo	N	OAC 3745-31-05(D) (PTI P0107421, issued 5/26/2011)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on maximum material throughput per year to demonstrate compliance with emission limitations.  ET: Compliance is determined by monitoring, record keeping, and reporting requirements and the control efficiencies and fugitive particulate emission factors found in AP-42.  All requirements for this EU have been transferred from the PTI.



**Statement of Basis**  
 Miami Fort Power Station  
 Permit Number: P0099746  
 Facility ID: 1431350093

U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	rolling summation  PM2.5 emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.01 TPY, as 12-mo rolling summation (from temporary gypsum storage piles material handling system, transfer and conveying - gypsum handling).												
F010	Visible particulate emissions from any	17-07(B)(7)(b)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require daily dust control inspections (operations assessments) as an indicator



**Statement of Basis**  
 Miami Fort Power Station  
**Permit Number:** P0099746  
**Facility ID:** 1431350093

U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
	material handling operation shall not exceed 20% opacity as a 3-min avg												of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the dust control inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitations in accordance with Method 9 procedures since the applicable compliance method under the OAC rules is Method 9, as specified in the testing terms.
B010 B011 B012 B013	Visible particulate emissions from any stack(s) shall not exceed 20% opacity as 6-min avg, except as provided by rule	17-07(A)(1)	N	N	Y	N	N	N	N	N	N	N	OR: Combustion of inherently clean fuel (No. 2 fuel oil) required. M, R, Rp, ET: Combustion of inherently clean fuel (No. 2 fuel oil) required, therefore no M, R, or Rp required for VEs except for records of type of fuel combusted. Method 9 visible emissions observations to determine compliance under provisions in OAC rule 3745-15-04(A).
B010	PE shall not exceed	17-11(B)(4)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The emission limitation reflects the



**Statement of Basis**  
 Miami Fort Power Station  
**Permit Number:** P0099746  
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U(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B015	SO <sub>2</sub> emissions shall not exceed 2.37 lbs/MMBtu, as a rolling 30-day average	N	OAC rule 3745-31-02(A)(2) (PTI 14-05559 issued 8/27/2004)	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs continuous emissions monitor for SO <sub>2</sub> ; therefore no stack testing is required to determine compliance.  All requirements for this EU have been transferred from the PTI.
B015	Visible particulate emissions shall not exceed 20% opacity as 6-min avg,	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Emissions unit employs a continuous opacity monitor; therefore no stack test observations are required to determine compliance.
B015	PE shall not exceed 0.10 lb/MMBtu	17-10(C)(1)	N	N	N	Y	N	Y	Y	Y	N	N	EU subject to CAM requirements for control of PE emissions and stack testing to determine compliance, unless PE otherwise regulated under the M, R, Rp, and ET found in the NESHAP Subpart UUUUU.
B011 B012 B013	0.040 lb/MMBtu												emissions unit's potential to emit at the maximum rated capacity, using AP-42 emission factors. If required, stack emissions testing will be conducted using EPA-approved methods.
B010 B011 B012 B013	SO <sub>2</sub> shall not exceed 0.5 lb/MMBtu	18-37(B)(4)	N	N	Y	Y	N	Y	Y	N	N	N	OR: Operational restrictions are contained in the permit terms and include fuel usage and sulfur content limitations to ensure compliance.  ET: Monitoring (sampling) and record keeping of fuel used to determine compliance.
B010 B011 B012 B013	None	N	40 CFR 63, Subpart YYYY	Y	N	N	N	N	N	N	N	N	ND: These EUs are existing stationary combustion turbines as defined in this federal rule. Existing stationary combustion turbines are exempt from the requirements of this subpart.



**DRAFT**

**Division of Air Pollution Control  
Title V Permit  
for  
Miami Fort Power Station**

Facility ID:	1431350093
Permit Number:	P0099746
Permit Type:	Renewal
Issued:	7/11/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Miami Fort Power Station

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**Draft Title V Permit**  
Miami Fort Power Station  
**Permit Number:** P0099746  
**Facility ID:** 1431350093

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

## Authorization

Facility ID: 1431350093  
Facility Description: electric power generating station  
Application Number(s): A0031454  
Permit Number: P0099746  
Permit Description: Title V renewal permit for the Dynegy Miami Fort utility power generating station, which includes two pulverized coal-fired boilers, four combustion turbine peaking units, and multiple fugitive dust sources.  
Permit Type: Renewal  
Issue Date: 7/11/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0099745

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

Miami Fort Power Station  
11021 Brower Road  
P. O. Box 128  
North Bend, OH 45052-0128

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

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

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 Southwest Ohio Air Quality Agency. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Title V Permit**  
Miami Fort Power Station  
**Permit Number:** P0099746  
**Facility ID:** 1431350093  
**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 Southwest Ohio Air Quality Agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Southwest Ohio Air Quality Agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable

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

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

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

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

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

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

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

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

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

### **3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

#### **4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

#### **5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

#### **6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

#### **7. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.

- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## **8. Fees**

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

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

## **9. Marketable Permit Programs**

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

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

**10. Reasonably Anticipated Operating Scenarios**

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

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

**11. Reopening for Cause**

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

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

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

**12. Federal and State Enforceability**

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

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

**13. Compliance Requirements**

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

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

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Southwest Ohio Air Quality Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Southwest Ohio Air Quality Agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
    - b. The permittee's current compliance status.

- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

#### **15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Southwest Ohio Air Quality Agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Southwest Ohio Air Quality Agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

## 16. Emergencies

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

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

## 17. Off-Permit Changes

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

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

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

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

## 18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

**21. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Southwest Ohio Air Quality Agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Southwest Ohio Air Quality Agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**25. Records Retention Requirements Under State Law Only**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Southwest Ohio Air Quality Agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Southwest Ohio Air Quality Agency must be notified in writing of any transfer of this permit.

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



**Draft Title V Permit**  
Miami Fort Power Station  
**Permit Number:** P0099746  
**Facility ID:** 1431350093

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

**30. Submitting Documents Required by this Permit**

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Southwest Ohio Air Quality Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



**Draft Title V Permit**  
Miami Fort Power Station  
**Permit Number:** P0099746  
**Facility ID:** 1431350093  
**Effective Date:** To be entered upon final issuance

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



**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 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 the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
L002	Cold solvent parts washer

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

3. The following insignificant emissions units located at this facility are subject to all applicable requirements as outlined in OAC rule 3745-31-03(A)(4)(b):

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B004	289 HP emergency diesel generator [PBR15196]
B017	240 HP emergency diesel fire pump [PBR15196]
B018	670 HP emergency diesel generator [PBR15196]
B019	805 HP emergency diesel generator [PBR15196]
B020	175 HP emergency diesel generator [PBR15196]
B021	642 HP FGD emergency diesel generator [PBR15225]

*(Authority for term: OAC rule 3745-77-07(A)(13) and OAC rule 3745-31-03(A)(4)(b))*

4. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25 for Ambient Air Quality Emergency Episodes. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-04, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

*(Authority for term: OAC Chapter 3745-25)*

5. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61, Subpart M, and OAC Chapter 3745-20.

*(Authority for term: 40 CFR Part 61, Subpart M, and OAC rule 3745-20-02)*

6. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subparts A and UUUUU, National Emission Standards for Hazardous Air Pollutants (NESHAP) Coal- and Oil-fired Electric Utility Steam Generating Units: B015 and B016. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code

of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

*(Authority for term: 40 CFR Part 63)*

7. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and YYYY, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines: B010, B011, B012, and B013. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

*(Authority for term: 40 CFR Part 63)*

8. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subparts A and D, Standards of Performance for Electric Utility Steam Generating Units (NSPS): B016. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

*(Authority for term: 40 CFR Part 60)*

9. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subparts A and Y, Standards of Performance for Coal Preparation and Processing Plants (NSPS): F001. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

*(Authority for term: 40 CFR Part 60)*

10. The following insignificant emissions units identified above in this permit are subject to 40 CFR Part 63, Subparts A and ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines: B004, B017, B018, B019, B020, and B021. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

*(Authority for term: 40 CFR Part 63)*

11. The Southwest Ohio Air Quality Agency has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee on 4/6/2016, pursuant to 40 CFR Part 64, for emissions units B015 and B016. 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.

Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart UUUUU, upon the date that emissions units B015 and B016 become subject to this rule.

*(Authority for term: 40 CFR Part 64)*



12. Acid Rain Permits and Compliance – 40 CFR Part 72, 40 CFR Part 75, and OAC Chapter 3745-103

The permittee shall ensure that any affected emissions unit complies with the requirements of 40 CFR Part 72, 40 CFR Part 75, and OAC Chapter 3745-103, which includes submitting timely permit applications. Emissions exceeding any allowances that are lawfully held pursuant to these rules are prohibited.

*(Authority for term: 40 CFR Part 72, 40 CFR Part 75, and OAC Chapter 3745-103)*

13. The permittee shall ensure that any CAIR NO<sub>x</sub>, SO<sub>2</sub>, or NO<sub>x</sub> ozone season units complies with the requirements of OAC 3745-109, which includes submitting timely permit applications. The permittee shall ensure that the affected emissions units comply with those requirements as outlined in the permit application submitted as required by OAC rules 3745-109-03, 109-10 and 109-16 for the affected emissions units.

Note: Ohio EPA DAPC has completed proposed rule amendments for OAC chapter 3745-14, specifically, OAC rule 3745-14-01 and OAC rule 3745-14-06, which facilitated the transition of the affected units from OAC chapter 3745-14 into the federal Clean Air Interstate Rule (CAIR) program which began with the 2009 control periods. This began the process of “sunsetting” the parts of OAC chapter 3745-14 which were no longer needed as a result of Ohio’s CAIR rules (OAC chapter 3745-109).

The permittee shall also comply with any subsequent federally mandated programs that may replace the CAIR program affecting electric generating facilities. This includes the Cross-State Air Pollution Rule specified in B.14. below.

*(Authority for term: OAC rules 3745-77-07(A)(5) and 3745-109)*

14. Transportation Rule (TR) Trading Program Requirements

- a) The permittee shall comply with all applicable Cross-State Air Pollution Rule (CSAPR) requirements (40 CFR Part 97, Subparts AAAAA – DDDDD) by the compliance date specified in 40 CFR 97, Subparts AAAAA – DDDDD.
- b) The TR subject units, and the unit-specific monitoring provisions at this source, are identified in the following table. These units are subject to the requirements for the TR NO<sub>x</sub> Annual Trading Program, TR NO<sub>x</sub> Ozone Season Trading Program, and/or TR SO<sub>2</sub> Group 1 Trading Program.

<p><u>Unit ID:</u>  B015 512 MW pulverized coal-fired boiler, Unit 7  B016 512 MW pulverized coal-fired boiler, Unit 8</p>
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Parameter	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO <sub>2</sub> monitoring) and 40 CFR part 75, subpart H (for NO <sub>x</sub> monitoring)	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E	Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19	EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E
SO <sub>2</sub>	x				
NO <sub>x</sub>	x				
Heat input					

- c) The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (TR NO<sub>x</sub> Annual Trading Program), 97.530 through 97.535 (TR NO<sub>x</sub> Ozone Season Trading Program), and 97.630 through 97.635 (TR SO<sub>2</sub> Group 1 Trading Program), as applicable. The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable TR trading programs.
- d) Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan is available at the EPA's website at: <http://www.epa.gov/airmarkets/emissions/monitoringplans.html>.
- e) Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR Part 75, subpart E and 40 CFR 75.66 and 97.435 (TR NO<sub>x</sub> Annual Trading Program), 97.535 (TR NO<sub>x</sub> Ozone Season Trading Program), and 40 CFR 97.635 (TR SO<sub>2</sub> Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
- f) Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (TR NO<sub>x</sub> Annual Trading Program), 97.530 through 97.534 (TR NO<sub>x</sub> Ozone Season Trading Program), and 97.630 through 97.634 (TR SO<sub>2</sub> Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (TR NO<sub>x</sub> Annual

Trading Program), 97.535 (TR NO<sub>x</sub> Ozone Season Trading Program), and 97.635 (TR SO<sub>2</sub> Group 1 Trading Program). The Administrator’s response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on EPA’s website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.

g) The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NO<sub>x</sub> Annual Trading Program), 97.530 through 97.534 (TR NO<sub>x</sub> Ozone Season Trading Program), and 97.630 through 97.634 (TR SO<sub>2</sub> Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add to or change this unit’s monitoring system description.

h) TR NO<sub>x</sub> Annual Trading Program requirements

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

i) TR NO<sub>x</sub> Ozone Season Trading Program requirements

Designated representative requirements	97.506(a), 97.513-97.518
Emissions monitoring, reporting and recordkeeping requirements	97.506(b), 97.530-97.535
NO <sub>x</sub> emissions requirements	97.506(c)
Title V permit revision requirements	97.506(d)
Additional recordkeeping and reporting requirements	97.506(e)
Liability	97.506(f)
Effect on other authorities	97.506(g)

j) TR SO<sub>2</sub> Group 1 Trading Program requirements

Designated representative requirements	97.606(a), 97.613-97.618
Emissions monitoring, reporting and recordkeeping requirements	97.606(b), 97.630-97.635
SO <sub>2</sub> emissions requirements	97.606(c)
Title V permit revision requirements	97.606(d)
Additional recordkeeping and reporting requirements	97.606(e)
Liability	97.606(f)
Effect on other authorities	97.606(g)

(Authority for term: 40 CFR Part 97)



15. The following abbreviations are used throughout this permit:

ESP = Electrostatic precipitator

FGD = Flue gas desulfurization

NO<sub>x</sub> = Nitrogen Oxides

CO = Carbon Monoxide

VOC = Volatile Organic Compounds

PE = Particulate matter measurable by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

PM<sub>10</sub> = Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

PM<sub>2.5</sub> = Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix L and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

SO<sub>2</sub> = Sulfur dioxide

HAP = Hazardous Air Pollutant

TPY = Ton(s) per year

MMBtu = million British thermal units

MW = megawatt

HP = horsepower

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code

ORC = Ohio Revised Code



**Draft Title V Permit**  
Miami Fort Power Station  
**Permit Number:** P0099746  
**Facility ID:** 1431350093  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. B015, Unit # 7**

**Operations, Property and/or Equipment Description:**

Babcock & Wilcox pulverized coal-fired, dry-bottom utility boiler, having a nominal heat input capacity of 5,025 MMBtu/hr, and equipped with low NOx burners, ESPs, selective catalytic reduction (SCR), and a FGD system (scrubbers)

- 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) b)(1)a. and g)(1).
- 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 3745-31-02(A) and OAC rule 3745-31-01(SSS)(1)(b)  (PTI 14-05559, issued 8/27/2004)	SO <sub>2</sub> emissions shall not exceed 2.37 pounds per MMBtu of actual heat input based upon a rolling, 30-day average, as verified by the SO <sub>2</sub> continuous emission monitoring system (CEMS) and the associated record keeping and reporting requirements specified in this permit.  See g)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(C)(1)	PE shall not exceed 0.10 pound per MMBtu of actual heat input.
d.	OAC rule 3745-18-37(BB)(5)	SO <sub>2</sub> emissions shall not exceed 5.5 pounds per MMBtu of actual heat input.
e.	40 CFR Part 63, Subpart UUUUU [40 CFR 63.9980-10042]  <i>National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-fired Electric Utility Steam Generating Units</i>  [In accordance with 40 CFR 63.9980 to 63.9982 and the definitions in	Except as provided under the Emissions Averaging provisions specified in 63.10009, the permittee shall comply with the following emission limitations as specified in 40 CFR 63.9991 and Table 2 (coal-fired unit, not using low rank virgin coal):  Mercury (Hg) 1.2E0 lb/TBtu or 1.3E-2 lb/GWh.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>63.10042, this emissions unit is an existing coal-fired electric utility steam generating unit (EGU), constructed prior to 5/3/11.]</p>	<p>Comply with either limit:</p> <p>Hydrogen chloride (HCl) 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh; <u>OR</u> Sulfur dioxide (SO<sub>2</sub>) 2.0E-1 lb/MMBtu or 1.5E0 lb/MWh.</p> <p>Comply with one of the following limits:</p> <p>1) 0.03 lb/MMBtu PE or 0.30 lb/MWh PE;  <u>OR</u>          2) 5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh of Total non-Hg HAP metals; <u>OR</u>          3) each Individual HAP metal as follows:</p> <p>Antimony (Sb) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;</p> <p>Arsenic (As) 1.1E0 lb/TBtu or 2.0 E-2 lb/GWh;</p> <p>Beryllium (Be) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh;</p> <p>Cadmium (Cd) 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh;</p> <p>Chromium (Cr) 2.8E0 lb/TBtu or 3.0E-2 lb/GWh;</p> <p>Cobalt (Co) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;</p> <p>Lead (Pb) 1.2E0 lb/TBtu or 2.0E-2 lb/GWh;</p> <p>Manganese (Mn) 4.0E0 lb/TBtu or 5.0E-2 lb/GWh;</p> <p>Nickel (Ni) 3.5E0 lb/TBtu or 4.0E-2 lb/GWh; and</p> <p>Selenium (Se) 5.0E lb/TBtu or 6.0E-2 lb/GWh.</p> <p>See c)(2).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63.1-15 [40 CFR 63.10040]	Table 9 to 40 CFR Part 63, Subpart UUUUU – Applicability of General Provisions (Subpart A) to Subpart UUUUU shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.
g.	40 CFR Part 64 [40 CFR 64.1-10]  <i>Compliance Assurance Monitoring (CAM)</i>	See b)(2)b., b)(2)d., b)(2)e., d)(3), d)(4), d)(7) - d)(11), e)(2), e)(5) - e)(6), and f)(2).  Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart UUUUU, after the compliance date in that rule.

(2) Additional Terms and Conditions

- a. This emissions unit has the capability of co-firing coal and petroleum coke.
- b. 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, and Appendix F, Procedure 3. 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: OAC rule 3745-77-07(A)(1), OAC rule 3745-17-07(A), 40 CFR 60.13, 40 CFR Part 60, Appendices B and F, and 40 CFR Part 64)*

- c. The permittee shall maintain a written quality assurance/quality control plan for the continuous SO<sub>2</sub> monitoring system, designed to ensure continuous valid and representative readings of SO<sub>2</sub> emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO<sub>2</sub> monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous SO<sub>2</sub> monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative



accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

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

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-18-37(BB)(5), OAC rule 3745-31-02(A), 40 CFR 60.13 and 40 CFR Part 60, Appendix F, and 40 CFR Part 75)*

- d. The opacity and SO<sub>2</sub> continuous monitoring systems consist 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: OAC rule 3745-77-07(A)(1), OAC rule 3745-18-37(BB)(5), OAC rule 3745-31-02(A), 40 CFR 60.2, 40 CFR Part 60, Appendix F, 40 CFR Part 75, and 40 CFR Part 64)*

- e. At all times, the permittee shall maintain the continuous opacity monitoring, including but not limited to, maintaining necessary parts for routine repairs of the continuous opacity monitoring system equipment, in accordance with the proper maintenance requirements of CAM.

*(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7(b))*

c) Operational Restrictions

- (1) The quantity of petroleum coke co-fired with coal in this emissions unit shall not exceed 40%, by weight.

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

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.9991(a)(1), 63.10000(a), and Table 3: #1, #3, and #4	Work practice standards - requirements for existing EGU tune-ups; requirements for start-up of coal-fired EGUs; requirements for shutdown of coal-fired EGUs (see below)
63.10000(b)	General duty to minimize emissions
63.10001	Malfunctions

63.10005(j) and Table 3: #3 and #4	Startup and shutdown requirements
63.10021(e) and Table 3: #1	Periodic tune-up requirements

*(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart UUUUU)*

d) Monitoring and/or Recordkeeping Requirements

- (1) To obtain an exemption from the visible emissions limitations specified in OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor(s) and recorder(s) that measure and record the temperature of the boiler exhaust gases entering the ESP:
  - a. during all periods of start-up until the ESPs are operational or until the inlet temperature of the ESPs achieve a temperature of two hundred fifty (250) degrees Fahrenheit; and
  - b. during all periods of shutdown until the inlet temperature of the ESPs drop below the temperature of two hundred fifty (250) degrees Fahrenheit. An electronic or hardcopy record of the temperature during periods of start-up and shutdown shall be maintained.

The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

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

- (2) When petroleum coke is co-fired with coal in this emissions unit, the permittee shall maintain daily records of the total quantity of petroleum coke burned, in tons, the total quantity of coal burned, in tons, and the quantity of petroleum coke co-fired, in percent by weight.

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

- (3) 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.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64)*

- (4) The permittee shall operate and maintain the continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from the 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 the following:

- a. percent opacity on an instantaneous (one-minute or less) 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 and continuous opacity monitoring system;
- d. the date, time, and hours of operation of the emissions unit without the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous opacity monitoring system; as well as; and
- f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64)*

- (5) The permittee shall maintain on site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous SO<sub>2</sub> monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-37(BB)(5), OAC rule 3745-31-02(A), 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 75)*

- (6) The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> emissions from the emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub> monitoring system including, but not limited to:

- a. emissions of SO<sub>2</sub> in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;

- b. the average hourly, average daily, and rolling, 30-day average emission rates of SO<sub>2</sub> in lb/MMBtu actual heat input;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit and continuous SO<sub>2</sub> monitoring system;
- g. the date, time, and hours of operation of the emissions unit without the continuous SO<sub>2</sub> monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous SO<sub>2</sub> monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-37(BB)(5), OAC rule 3745-31-02(A), 40 CFR 60.13, 40 CFR Part 60, Appendix B & F, and 40 CFR Part 75)*

- (7) The CAM plan for this emissions unit has been developed for PE. The CAM performance indicator for PE is the opacity of the visible particulate emissions as measured and recorded by the certified continuous opacity monitoring (COM) system located in the ductwork between the ESP outlet and the wet scrubber inlet. The visible particulate emissions indicator range is each three-hour block average with an opacity value greater than 20%. The three-hour block average opacity shall be based on the instantaneous values recorded in d)(4)a. When the opacity value over the averaging period of the indicator range is greater than 20%, corrective action (including, but not limited to, an evaluation of the emissions unit, COM, and ESP) shall be assessed and implemented as appropriate.

Upon detecting an excursion of the visible particulate emission indicator range, 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 thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)*

- (8) Whenever the monitored value for opacity varies from the range established in accordance with d)(7) of this permit, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the excursion was first observed;
  - b. the magnitude of the excursion at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of an excursion, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the excursion ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the opacity readings after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.9)*

- (9) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated

conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)*

- (10) 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), 40 CFR Part 64.7, and 40 CFR Part 64.8)*

- (11) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the PE monitoring requirements specified in 40 CFR 63.10010-10023 may satisfy the monitoring requirements of 40 CFR Part 64 specified in d)(7) - d)(10), if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU. Since the CAM requirements of 40 CFR Part 64 will continue to apply after the date specified in 40 CFR Part 63, Subpart UUUUU, the CAM plan shall be revised at such time to be consistent with the MACT monitoring requirements, if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU.

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

- (12) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.10000(d)	Site-specific monitoring plan requirements
63.10005(d)	Continuous monitoring system requirements
63.10005(j), 63.10021(h), and Table 3	Startup and shutdown monitoring and record keeping requirements
63.10009(j)	Emissions averaging plan requirements
63.10010(a)-(j)	Monitoring, installation, operation and maintenance requirements
63.10020(a)-(d)	Continuous monitoring and data collection requirements
63.10021(a)-(c)	Continuous compliance demonstration requirements
63.10022	Continuous compliance demonstration requirements for emissions

	averaging
63.10023	PM CPMS requirements
63.10032(a)-(i)	Required overall records to be maintained
63.10033(a)-(c)	Format and retention of records

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

- (13) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05559, issued on August 27, 2004:d)(1) – d)(12). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any daily record showing that the quantity of petroleum coke co-fired with coal in this emissions unit exceeded 40%, by weight. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 45 days after the exceedance occurs.
- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous opacity monitor;

- iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;
- iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
- v. each period of time (start time and date, and end time and date) when the opacity was outside of the range specified in d)(7), the cause of each incident, and the corrective actions taken;
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
- viii. the date, time, and duration of any/each malfunction\*\* of the continuous opacity monitoring system and/or emissions unit;
- ix. the date, time, and duration of any downtime\*\* of the continuous opacity monitoring system while the emissions unit was in operation; and
- x. the reason (if known) and the corrective actions taken (if any) for each event in (b)(viii) and (ix).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

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

\*\* each downtime and malfunction event shall be reported regardless if there is an exceedance of the opacity limit.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), 40 CFR 60.7, and 40 CFR Part 64)*

- (3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO<sub>2</sub> monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of SO<sub>2</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Part 75, OAC Chapter 3745-18, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if



known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
- i. the facility name and address;
  - ii. the manufacturer and model number of the continuous SO<sub>2</sub> and other associated monitors;
  - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
  - iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
  - v. the total SO<sub>2</sub> emissions for the calendar quarter (tons);
  - vi. the total operating time (hours) of the emissions unit;
  - vii. the total operating time of the continuous SO<sub>2</sub> monitoring system while the emissions unit was in operation;
  - viii. results and dates of quarterly cylinder gas audits or linearity checks;
  - ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
  - x. unless previously submitted, the results of any relative accuracy test audit showing the continuous SO<sub>2</sub> monitor out-of-control and the compliant results following any corrective actions;
  - xi. the date, time, and duration of any/each malfunction\*\* of the continuous SO<sub>2</sub> monitoring system and/or emissions unit;
  - xii. the date, time, and duration of any downtime\*\* of the continuous SO<sub>2</sub> monitoring system while the emissions unit was in operation; and
  - xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-02(A) and 3745-18-37(BB) rule-based or NSPS-based limitation(s) in this permit.



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

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

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-37(BB)(5), OAC rule 3745-31-02(A), 40 CFR 60.7, and 40 CFR Part 75)*

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

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 75)*

- (5) If the permittee is required under 40 CFR Part 64.8 and d)(10) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)*

- (6) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the reporting requirements specified in 40 CFR 63.10030 and 63.10031 may satisfy the reporting requirements of 40 CFR Part 64 contained in e)(2)b.v. and e)(5), if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU. Since the CAM requirements of 40 CFR Part 64 will continue to apply after the date specified in 40 CFR Part 63, Subpart UUUUU, the CAM plan shall be revised at such time to be consistent with the MACT reporting requirements, if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU.

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

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

63.10030(a)	Overall notification reporting requirements
63.10030(b)	Initial notification reports
63.10030(d)	Notification of intent to test
63.10030(e)	Notification of compliance status
63.10031(a)-(b)	Reporting requirements and due dates

and Table 8	
63.10031(c)-(d) and (g)	Compliance report content
63.10031(e)	Title V monitoring report allowance
63.10031(f)	Reporting requirements for EPA's WebFIRE database
63.10031(g)	Malfunction reporting requirements

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

- (8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05559, issued on August 27, 2004: e)(1) – e)(7). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

SO<sub>2</sub> emissions shall not exceed 2.37 pounds per MMBtu of actual heat input, based upon a rolling, 30-day average.

SO<sub>2</sub> emissions shall not exceed 5.5 pounds per MMBtu of actual heat input.

Applicable Compliance Method:

Ongoing compliance with the above pound per MMBtu SO<sub>2</sub> emission limitations contained in this permit, and in 40 CFR Parts 60 and 75, may be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-37(BB)(5), OAC rule 3745-31-02(A), 40 CFR 60.13, 40 CFR Part 60, Appendix B & F, and 40 CFR Part 75)*

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.



Applicable Compliance Method:

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

If required, compliance shall be demonstrated through visible particulate emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

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

c. Emission Limitation:

PE shall not exceed 0.10 pound per MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with the pound per MMBtu allowable emission limitation above shall be demonstrated based on the results of the PE testing required in f)(2) below.

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(C))*

d. Emission Limitations:

Mercury (Hg) 1.2E0 lb/TBtu or 1.3E-2 lb/GWh.

Comply with either limit:

Hydrogen chloride (HCl) 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh; OR Sulfur dioxide (SO<sub>2</sub>) 2.0E-1 lb/MMBtu or 1.5E0 lb/MWh.

Comply with one of the following limits:

1) 0.03 lb/MMBtu PE or 0.30 lb/MWh PE; OR

2) 5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh of Total non-Hg HAP metals; OR

3) each Individual HAP metal as follows:

Antimony (Sb) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;

Arsenic (As) 1.1E0 lb/TBtu or 2.0 E-2 lb/GWh;

Beryllium (Be) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh;

Cadmium (Cd) 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh;



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Chromium (Cr) 2.8E0 lb/TBtu or 3.0E-2 lb/GWh;

Cobalt (Co) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;

Lead (Pb) 1.2E0 lb/TBtu or 2.0E-2 lb/GWh;

Manganese (Mn) 4.0E0 lb/TBtu or 5.0E-2 lb/GWh;

Nickel (Ni) 3.5E0 lb/TBtu or 4.0E-2 lb/GWh; and

Selenium (Se) 5.0E lb/TBtu or 6.0E-2 lb/GWh.

Applicable Compliance Method:

Compliance with the applicable limit(s) shall be demonstrated in accordance with the requirements of 40 CFR Part 63, Subpart UUUUU, in f)(3) below.

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted approximately 2.5 years after issuance of the permit (following the effective date for the Title V permit) and within 6 months prior to the permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE of 0.10 lb/MMBtu.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For PE: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5B and the procedures in OAC rule 3745-17-03(B)(9).

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

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.



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- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the appropriate Ohio EPA District Office or local air agency. The “Intent to Test” notification shall describe in detail the proposed test methods and procedures, the emissions unit 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 Ohio EPA District Office’s or local air agency’s refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- h. The permittee shall include six-minute continuous opacity monitoring data for the time periods during which the above PE testing was conducted in the written reports on the results of the emissions tests.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-10(C)(1), and 40 CFR Part 64)*

- (3) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.10000(c)	Initial performance testing
63.10000(c)(1)(i) and (iii), and 63.10005(h)	Low emitting EGU (LEE) qualifications and performance testing requirements
63.10000(c)(1)(vi) and Appendix A	Initial compliance requirements for Hg – sorbent trap monitoring system (non-LEE)
63.10005(a)-(d) and 63.10011	Initial compliance requirements
63.10005(e) and (f) and 63.10011	Initial compliance requirements for work practice standards
63.10006	Subsequent performance test requirements

63.10007(a)-(f) and Table 5	Performance test requirements and test methods
63.10009(a)-(n)	Emissions averaging compliance demonstration requirements
63.10021(a) and (d)	Continuous compliance demonstration requirements
63.10022	Continuous compliance demonstration requirements for emissions averaging

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05559, issued on August 27, 2004: (f)(1) – f(3). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) **Miscellaneous Requirements**

- (1) A voluntary control equipment upgrade project at Miami Fort Station was approved under PTI 14-05559, issued on August 27, 2004, for the installation of a FGD system (scrubbers) and exhaust stack which resulted in a change to the flue gas exhaust parameters of the coal-fired boilers (emissions units B015 and B016). Based upon modeling performed by the permittee, the change in the exhaust parameters had the potential of increasing the ambient air impact for SO<sub>2</sub> greater than 15 ug/m<sup>3</sup> as a 24-hour average. This increase triggered a state-only requirement for a permit modification pursuant to the definition of modification under OAC rule 3745-31-01(SSS)(1)(b) and requirements under OAC rule 3745-31-02(A)(1)(a). Per OAC rule 3745-31-05(A)(3)(a)(iii), this type of modification did not trigger best available technology requirements for these emissions units.

The permittee provided an air dispersion modeling assessment for the existing coal-fired boilers with the application for PTI 14-05559 in accordance with the requirements of Ohio EPA's Engineering Guide #69, dated 2003. The modeling submitted by the permittee demonstrated that the voluntary SO<sub>2</sub> emission rate accepted in b)(1)a. for emissions unit B015 as a result of the control equipment upgrade project will not cause or contribute to a violation of a National Ambient Air Quality Standard (NAAQS) and/or Prevention of Significant Deterioration (PSD) increment violation.

*(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-02(A), and 3745-31-01(SSS)(1)(b))*

**2. B016, Unit # 8**

**Operations, Property and/or Equipment Description:**

Babcock & Wilcox pulverized coal-fired, dry-bottom utility boiler, having a nominal heat input capacity of 5,025 MMBtu/hr, and equipped with low NOx burners, ESPs, selective catalytic reduction (SCR), and a FGD system (scrubbers)

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) b)(1)a. and g)(1).

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 3745-31-02(A) and OAC rule 3745-31-01(SSS)(1)(b)  (PTI 14-05559, issued 8/27/2004)	The SO <sub>2</sub> emission limitation established pursuant to these rules is equivalent to the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-18-37(BB)(6) and 40 CFR 60, Subpart D.  See g)(1).
b.	OAC rule 3745-31-05(A)(3)  (PTI 14-088, issued 4/24/1974)	See b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-10(C)(1)	PE shall not exceed 0.10 pound per MMBtu of actual heat input.
e.	OAC rule 3745-18-37(BB)(6)	SO <sub>2</sub> emissions shall not exceed 1.2 pounds per MMBtu of actual heat input.
f.	40 CFR Part 60, Subpart D (40 CFR 60.40 – 60.49)  <i>Standards of Performance (NSPS) for Fossil Fuel-Fired Steam Generators</i>	PE shall not exceed 0.10 pound per MMBtu of actual heat input. [60.42(a)(1)]  Exhaust gases shall not exhibit greater than 20% opacity, except for one 6-minute period per hour of not more than 27% opacity. [60.42(a)(2)]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>[In accordance with 40 CFR 60.40(a), the emissions unit is a fossil fuel-fired steam generating unit with a heat input capacity more than 73 megawatts (250 million Btu per hour) for which construction or modification commenced after August 17, 1971, and is subject to the emissions limitations and control measures specified in this section]</p>	<p>SO<sub>2</sub> emissions shall not exceed 1.2 pounds per MMBtu of actual heat input. [60.43(a)(2)]</p> <p>NO<sub>x</sub> emissions shall not exceed 0.70 pound per MMBtu of actual heat input. [60.44(a)(3)]</p> <p>The PE, opacity, and SO<sub>2</sub> emission limitations specified in this subpart are equivalent to, or more stringent than, the PE, opacity, and SO<sub>2</sub> emission limitations established pursuant to OAC rules 3745-17-07(A), OAC rule 3745-17-10(C), and OAC rule 3745-18-37(BB)(6). The permittee shall comply with all applicable emission limitations (including more stringent emission limitations) specified in this subpart.</p> <p>See b)(2)h.</p>
g.	<p>40 CFR 60.1 – 60.19 [40 CFR 60.1(a)]</p>	<p>The provisions of Subpart A apply to the owner or operator of any stationary source which contains an affected facility that commenced construction or modification after the date of publication in 40 CFR Part 60 that is applicable to that facility.</p>
h.	<p>40 CFR Part 63, Subpart UUUUU [40 CFR 63.9980-10042]</p> <p><i>National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-fired Electric Utility Steam Generating Units</i></p> <p>[In accordance with 40 CFR 63.9980 to 63.9982 and the definitions in 63.10042, this emissions unit is an existing coal-fired electric utility steam generating unit (EGU), constructed prior to 5/3/11.]</p>	<p>Except as provided under the Emissions Averaging provisions specified in 63.10009, the permittee shall comply with the following emission limitations as specified in 40 CFR 63.9991 and Table 2 (coal-fired unit, not using low rank virgin coal):</p> <p>Mercury (Hg) 1.2E0 lb/TBtu or 1.3E-2 lb/GWh.</p> <p>Comply with either limit:</p> <p>Hydrogen chloride (HCl) 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh; <u>OR</u> Sulfur dioxide (SO<sub>2</sub>) 2.0E-1 lb/MMBtu or 1.5E0 lb/MWh.</p> <p>Comply with one of the following limits:</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1) 0.03 lb/MMBtu PE or 0.30 lb/MWh PE; <u>OR</u> 2) 5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh of Total non-Hg HAP metals; <u>OR</u> 3) each Individual HAP metal as follows:  Antimony (Sb) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;  Arsenic (As) 1.1E0 lb/TBtu or 2.0 E-2 lb/GWh;  Beryllium (Be) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh;  Cadmium (Cd) 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh;  Chromium (Cr) 2.8E0 lb/TBtu or 3.0E-2 lb/GWh;  Cobalt (Co) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;  Lead (Pb) 1.2E0 lb/TBtu or 2.0E-2 lb/GWh;  Manganese (Mn) 4.0E0 lb/TBtu or 5.0E-2 lb/GWh;  Nickel (Ni) 3.5E0 lb/TBtu or 4.0E-2 lb/GWh; and  Selenium (Se) 5.0E lb/TBtu or 6.0E-2 lb/GWh.  See c)(1).
i.	40 CFR Part 63.1-15 [40 CFR 63.10040]	Table 9 to 40 CFR Part 63, Subpart UUUUU – Applicability of General Provisions (Subpart A) to Subpart UUUUU shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.
j.	40 CFR Part 64 [40 CFR 64.1-10]	See b)(2)b., b)(2)f., b)(2)g., d)(2), d)(3), d)(11) - d)(15), e)(1), e)(7), e)(8), and f)(2).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<i>Compliance Assurance Monitoring (CAM)</i>	Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart UUUUU, after the compliance date in that rule.

(2) Additional Terms and Conditions

- a. No applicable emission limitations or control measures were established for this emissions unit in PTI 14-088.
- b. 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, and Appendix F, Procedure 3. 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: OAC rule 3745-77-07(A)(1), OAC rule 3745-17-07(A), 40 CFR 60, Subpart D, 40 CFR 60.13, 40 CFR Part 60, Appendices B and F, and 40 CFR Part 64)*

- c. The permittee shall maintain a written quality assurance/quality control plan for the continuous SO<sub>2</sub> monitoring system, designed to ensure continuous valid and representative readings of SO<sub>2</sub> emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO<sub>2</sub> monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous SO<sub>2</sub> monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks

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

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-02(A), OAC rule 3745-18-37(BB)(6), 40 CFR Part 60, Subpart D, 40 CFR 60.13 and 40 CFR Part 60, Appendix F, and 40 CFR Part 75)*

- d. The permittee shall maintain a written quality assurance/quality control plan for the continuous NO<sub>x</sub> monitoring system, designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous NO<sub>x</sub> monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

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

*(Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart D, 40 CFR 60.13 and 40 CFR Part 60, Appendix F, and 40 CFR Part 75)*

- e. The permittee shall maintain a written quality assurance/quality control plan for the continuous CO<sub>2</sub> monitoring system, designed to ensure continuous valid and representative readings of CO<sub>2</sub> emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous CO<sub>2</sub> monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous CO<sub>2</sub> monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.



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

*(Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart D, 40 CFR 60.13 and 40 CFR Part 60, Appendix F, and 40 CFR Part 75)*

- f. The opacity, SO<sub>2</sub>, NO<sub>x</sub>, and CO<sub>2</sub> continuous monitoring systems consist 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: OAC rule 3745-77-07(A)(1), OAC rule 3745-17-07(A), OAC rule 3745-31-02(A), OAC rule 3745-18-37(BB)(6), 40 CFR Part 60, Subpart D, 40 CFR 60.2, 40 CFR Part 60, Appendix F, and 40 CFR Part 64)*

- g. At all times, the permittee shall maintain the continuous opacity monitoring, including but not limited to, maintaining necessary parts for routine repairs of the continuous opacity monitoring system equipment, in accordance with the proper maintenance requirements of CAM.

*(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7(b))*

- h. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.9991(a)(1), 63.10000(a), and Table 3: #1, #3, and #4	Work practice standards - requirements for existing EGU tune-ups; requirements for start-up of coal-fired EGUs; requirements for shutdown of coal-fired EGUs (see below)
63.10000(b)	General duty to minimize emissions
63.10001	Malfunctions
63.10005(j) and Table 3: #3 and #4	Startup and shutdown requirements



63.10021(e) and Table 3: #1	Periodic tune-up requirements
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(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart UUUUU)

d) Monitoring and/or Recordkeeping Requirements

- (1) To obtain an exemption from the visible emissions limitations specified in OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor(s) and recorder(s) that measure and record the temperature of the boiler exhaust gases entering the ESP:
  - a. during all periods of start-up until the ESPs are operational or until the inlet temperature of the ESPs achieve a temperature of two hundred fifty (250) degrees Fahrenheit; and
  - b. during all periods of shutdown until the inlet temperature of the ESPs drop below the temperature of two hundred fifty (250) degrees Fahrenheit. An electronic or hardcopy record of the temperature during periods of start-up and shutdown shall be maintained.

The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

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

- (2) 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.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), 40 CFR 60, Subpart D, 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64)

- (3) The permittee shall operate and maintain the continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from the 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 the following:

- a. percent opacity on an instantaneous (one-minute or less) 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 and continuous opacity monitoring system;
- d. the date, time, and hours of operation of the emissions unit without the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous opacity monitoring system; as well as; and
- f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), 40 CFR 60, Subpart D, 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64)*

- (4) The permittee shall maintain on site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous SO<sub>2</sub> monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-37(BB)(6), OAC rule 3745-31-02(A), 40 CFR 60, Subpart D, 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 75)*

- (5) The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> emissions from the emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub> monitoring system including, but not limited to:

- a. emissions of SO<sub>2</sub> in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. the average hourly, average daily, and rolling, 30-day average emission rates of SO<sub>2</sub> in lb/MMBtu actual heat input;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit and continuous SO<sub>2</sub> monitoring system;
- g. the date, time, and hours of operation of the emissions unit without the continuous SO<sub>2</sub> monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous SO<sub>2</sub> monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-37(BB)(6), OAC rule 3745-31-02(A), 40 CFR 60, Subpart D, 40 CFR 60.13, 40 CFR Part 60, Appendix B & F, and 40 CFR Part 75)*

- (6) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NO<sub>x</sub> monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60, Subpart D, 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 75)*

- (7) The permittee shall operate and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to:

- a. emissions of NO<sub>x</sub> in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. the average hourly, average daily, and rolling, 30-day average emission rates of NO<sub>x</sub> in lb/MMBtu actual heat input;
- c. results of quarterly cylinder gas audits or linearity checks;

- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit and continuous NO<sub>x</sub> monitoring system;
- g. the date, time, and hours of operation of the emissions unit without the continuous NO<sub>x</sub> monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous NO<sub>x</sub> monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

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

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60, Subpart D, 40 CFR 60.13, and 40 CFR Part 60, Appendix B and F, and 40 CFR Part 75)*

- (8) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous CO<sub>2</sub> monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60, Subpart D, 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 75)*

- (9) The permittee shall operate and maintain equipment to continuously monitor and record the hourly average CO<sub>2</sub> emitted from this emissions unit in percent CO<sub>2</sub>. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60 and Part 75.

The permittee shall maintain records of all data obtained by the continuous CO<sub>2</sub> monitoring system including, but not limited to:

- a. the percent CO<sub>2</sub> with each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. results of quarterly cylinder gas audits or linearity checks;
- c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

- d. results of required relative accuracy test audit(s);
- e. hours of operation of the emissions unit, continuous CO<sub>2</sub> monitoring system;
- f. the date, time, and hours of operation of the emissions unit without the continuous CO<sub>2</sub> monitoring system;
- g. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous CO<sub>2</sub> monitoring system; as well as,
- h. the reason (if known) and the corrective actions taken (if any) for each such event in (f) and (g).

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

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60, Subpart D, 40 CFR 60.13, 40 CFR Part 60, Appendix B and F, and 40 CFR Part 75)*

- (10) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subparts D and A, including the following sections:

60.45(a)	Continuous monitoring of opacity, SO <sub>2</sub> , NO <sub>x</sub> , and CO <sub>2</sub> or O <sub>2</sub>
60.45(c)	CEMS requirements
60.45(e) and (f)	Conversion of CEMS data to units of applicable standard(s)

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 60, Subpart D)*

- (11) The CAM plan for this emissions unit has been developed for PE. The CAM performance indicator for PE is the opacity of the visible particulate emissions as measured and recorded by the certified continuous opacity monitoring (COM) system located in the ductwork between the ESP outlet and the wet scrubber inlet. The visible particulate emissions indicator range is each three-hour block average with an opacity value greater than 20%. The three-hour block average opacity shall be based on the instantaneous values recorded in d)(3)a. When the opacity value over the averaging period of the indicator range is greater than 20%, corrective action (including, but not limited to, an evaluation of the emissions unit, COM, and ESP) shall be assessed and implemented as appropriate.

Upon detecting an excursion of the visible particulate emission indicator range, 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 thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)*

- (12) Whenever the monitored value for opacity varies from the range established in accordance with d)(11) of this permit, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the excursion was first observed;
  - b. the magnitude of the excursion at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of an excursion, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the excursion ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the opacity readings after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.9)*

- (13) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator



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ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)*

- (14) 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), 40 CFR Part 64.7, and 40 CFR Part 64.8)*

- (15) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the PE monitoring requirements specified in 40 CFR 63.10010-10023 may satisfy the monitoring requirements of 40 CFR Part 64 specified in d)(11) - d)(14), if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU. Since the CAM requirements of 40 CFR Part 64 will continue to apply after the date specified in 40 CFR Part 63, Subpart UUUUU, the CAM plan shall be revised at such time to be consistent with the MACT monitoring requirements, if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU.

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

- (16) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.10000(d)	Site-specific monitoring plan requirements
63.10005(d)	Continuous monitoring system requirements
63.10005(j), 63.10021(h), and Table 3	Startup and shutdown monitoring and record keeping requirements
63.10009(j)	Emissions averaging plan requirements
63.10010(a)-(j)	Monitoring, installation, operation and maintenance requirements
63.10020(a)-(d)	Continuous monitoring and data collection requirements

63.10021(a)-(c)	Continuous compliance demonstration requirements
63.10022	Continuous compliance demonstration requirements for emissions averaging
63.10023	PM CPMS requirements
63.10032(a)-(i)	Required overall records to be maintained
63.10033(a)-(c)	Format and retention of records

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

- (17) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05559, issued on August 27, 2004, and Permit to Install #14-088, issued on April 24, 1974:d)(1) – d)(16). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous opacity monitor;
    - iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;

- iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
- v. each period of time (start time and date, and end time and date) when the opacity was outside of the range specified in d)(11), the cause of each incident, and the corrective actions taken;
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
- viii. the date, time, and duration of any/each malfunction\*\* of the continuous opacity monitoring system and/or emissions unit;
- ix. the date, time, and duration of any downtime\*\* of the continuous opacity monitoring system while the emissions unit was in operation; and
- x. the reason (if known) and the corrective actions taken (if any) for each event in (b)(viii) and (ix).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

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

\*\* each downtime and malfunction event shall be reported regardless if there is an exceedance of the opacity limit.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), 40 CFR 60, Subpart D, 40 CFR 60.7, and 40 CFR Part 64)*

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO<sub>2</sub> monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of SO<sub>2</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Part 75, OAC Chapter 3745-18, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

- i. the facility name and address;
- ii. the manufacturer and model number of the continuous SO<sub>2</sub> and other associated monitors;
- iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
- iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
- v. the total SO<sub>2</sub> emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous SO<sub>2</sub> monitoring system while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits or linearity checks;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous SO<sub>2</sub> monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\*\* of the continuous SO<sub>2</sub> monitoring system and/or emissions unit;
- xii. the date, time, and duration of any downtime\*\* of the continuous SO<sub>2</sub> monitoring system while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-02(A) and 3745-18-37(BB) rule-based or NSPS-based limitation(s) in this permit.

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

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-02(A), OAC rule 3745-18-37(BB)(6), 40 CFR 60, Subpart D, 40 CFR 60.7, and 40 CFR Part 75)*

- (3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO<sub>x</sub> monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO<sub>x</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Parts 75 and 76, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous NO<sub>x</sub> and other associated monitors;
    - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
    - iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
    - v. the total NO<sub>x</sub> emissions for the calendar quarter (tons);
    - vi. the total operating time (hours) of the emissions unit;
    - vii. the total operating time of the continuous NO<sub>x</sub> monitoring system while the emissions unit was in operation;
    - viii. results and dates of quarterly cylinder gas audits or linearity checks;
    - ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
    - x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO<sub>x</sub> monitor out-of-control and the compliant results following any corrective actions;

- xi. the date, time, and duration of any/each malfunction\*\* of the continuous NOx monitoring system and/or emissions unit;
- xii. the date, time, and duration of any downtime\*\* of the continuous NOx monitoring system while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

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

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

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

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60, Subpart D, 40 CFR 60.7, and 40 CFR Part 75)*

- (4) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO<sub>2</sub> monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of continuous CO<sub>2</sub> monitoring system downtime and malfunction while the emissions unit was on line.
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous CO<sub>2</sub> and other associated monitors;
    - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
    - iv. the total operating time (hours) of the emissions unit;
    - v. the total operating time of the continuous CO<sub>2</sub> monitoring system while the emissions unit was in operation;



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- vi. results and dates of quarterly cylinder gas audits or linearity checks;
- vii. unless previously submitted, results and dates of the relative accuracy test audit(s) (during appropriate quarter(s));
- viii. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO<sub>2</sub> monitor out-of-control and the compliant results following any corrective actions;
- ix. the date, time, and duration of any/each malfunction\* of the continuous CO<sub>2</sub> monitoring system while the emissions unit was in operation;
- x. the date, time, and duration of any downtime\* of the continuous CO<sub>2</sub> monitoring system while the emissions unit was in operation; and
- xi. the reason (if known) and the corrective actions taken (if any) for each event in (b)(ix) and (x).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

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

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60, Subpart D, 40 CFR 60.7, and 40 CFR Part 75)*

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

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 75)*

- (6) The permittee shall comply with the applicable reporting and notification requirements required under 40 CFR Part 60, Subparts D and A, including the following sections:

60.45(g)	Reporting requirements for performance tests, semi-annual monitoring system performance evaluations of continuous monitors, and semi-annual excess emissions
60.45(g)(1)	Opacity excess emissions reporting
60.45(g)(2)	SO <sub>2</sub> excess emissions reporting
60.45(g)(3)	NOx excess emissions reporting

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 60, Subpart D)*

- (7) If the permittee is required under 40 CFR Part 64.8 and d)(14) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)*

- (8) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the reporting requirements specified in 40 CFR 63.10030 and 63.10031 may satisfy the reporting requirements of 40 CFR Part 64 contained in e)(1)b.v. and e)(7), if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU. Since the CAM requirements of 40 CFR Part 64 will continue to apply after the date specified in 40 CFR Part 63, Subpart UUUUU, the CAM plan shall be revised at such time to be consistent with the MACT reporting requirements, if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU.

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

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

63.10030(a)	Overall notification reporting requirements
63.10030(b)	Initial notification reports
63.10030(d)	Notification of intent to test
63.10030(e)	Notification of compliance status
63.10031(a)-(b) and Table 8	Reporting requirements and due dates
63.10031(c)-(d) and (g)	Compliance report content
63.10031(e)	Title V monitoring report allowance
63.10031(f)	Reporting requirements for EPA's WebFIRE database
63.10031(g)	Malfunction reporting requirements

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

- (10) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05559, issued on August 27, 2004, and Permit to Install #14-088, issued on April 24, 1974: e)(1) – e)(9). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this

operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 1.2 pounds per MMBtu of actual heat input.

Applicable Compliance Method:

Ongoing compliance with the above pound per MMBtu SO<sub>2</sub> emission limitation contained in this permit, and in 40 CFR Parts 60 and 75, may be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-02(A), OAC rule 3745-18-37(BB)(6), 40 CFR 60, Subpart D, 40 CFR 60.13, 40 CFR Part 60, Appendix B & F, and 40 CFR Part 75)*

b. Emission Limitations:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Exhaust gases shall not exhibit greater than 20% opacity, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

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

If required, compliance shall be demonstrated through visible particulate emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9, 40 CFR 60, Subpart D, and OAC rule 3745-17-03(B)(1).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and 40 CFR 60, Subpart D)*



c. Emission Limitation:

PE shall not exceed 0.10 pound per MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with the pound per MMBtu allowable emission limitation above shall be demonstrated based on the results of the PE testing required in f)(2) and f)(3) below.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-10(C), and 40 CFR 60, Subpart D)*

d. Emission Limitation:

NOx emissions shall not exceed 0.70 pound per MMBtu of actual heat input.

Applicable Compliance Method:

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

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60, Subpart D, 40 CFR 60.13, 40 CFR Part 60, Appendix B & F, and 40 CFR Part 75)*

e. Emission Limitations:

Mercury (Hg) 1.2E0 lb/TBtu or 1.3E-2 lb/GWh.

Comply with either limit:

Hydrogen chloride (HCl) 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh; OR Sulfur dioxide (SO<sub>2</sub>) 2.0E-1 lb/MMBtu or 1.5E0 lb/MWh.

Comply with one of the following limits:

1) 0.03 lb/MMBtu PE or 0.30 lb/MWh PE; OR

2) 5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh of Total non-Hg HAP metals; OR

3) each Individual HAP metal as follows:

Antimony (Sb) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;

Arsenic (As) 1.1E0 lb/TBtu or 2.0 E-2 lb/GWh;



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- Beryllium (Be) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh;
- Cadmium (Cd) 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh;
- Chromium (Cr) 2.8E0 lb/TBtu or 3.0E-2 lb/GWh;
- Cobalt (Co) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;
- Lead (Pb) 1.2E0 lb/TBtu or 2.0E-2 lb/GWh;
- Manganese (Mn) 4.0E0 lb/TBtu or 5.0E-2 lb/GWh;
- Nickel (Ni) 3.5E0 lb/TBtu or 4.0E-2 lb/GWh; and
- Selenium (Se) 5.0E lb/TBtu or 6.0E-2 lb/GWh.

**Applicable Compliance Method:**

Compliance with the applicable limit(s) shall be demonstrated in accordance with the requirements of 40 CFR Part 63, Subpart UUUUU, in f(4) below.

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted approximately 2.5 years after issuance of the permit (following the effective date for the Title V permit) and within 6 months prior to the permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE of 0.10 lb/MMBtu.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For PE: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5B and the procedures in Subpart D (see f(3) below).

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

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these

conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the appropriate Ohio EPA District Office or local air agency. The “Intent to Test” notification shall describe in detail the proposed test methods and procedures, the emissions unit 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 Ohio EPA District Office’s or local air agency’s refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- h. The permittee shall include six-minute continuous opacity monitoring data for the time periods during which the above PE testing was conducted in the written reports on the results of the emissions tests.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-10(C), 40 CFR 60, Subpart D, and 40 CFR Part 64)*

- (3) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 60, Subparts D and A, including the following sections:

60.46(a)	Performance test requirements
60.46(b)	Performance test requirements for particulate standards
60.46(d)	Alternative compliance methods and procedures

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 60, Subpart D)*

- (4) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.10000(c)	Initial performance testing
63.10000(c)(1)(i) and (iii), and 63.10005(h)	Low emitting EGU (LEE) qualifications and performance testing requirements
63.10000(c)(1)(vi) and Appendix A	Initial compliance requirements for Hg – sorbent trap monitoring system (non-LEE)
63.10005(a)-(d) and 63.10011	Initial compliance requirements
63.10005(e) and (f) and 63.10011	Initial compliance requirements for work practice standards
63.10006	Subsequent performance test requirements
63.10007(a)-(f) and Table 5	Performance test requirements and test methods
63.10009(a)-(n)	Emissions averaging compliance demonstration requirements
63.10021(a) and (d)	Continuous compliance demonstration requirements
63.10022	Continuous compliance demonstration requirements for emissions averaging

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05559, issued on August 27, 2004, and Permit to Install #14-088, issued on April 24, 1974: (f)(1) – f(4). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) **Miscellaneous Requirements**

- (1) A control equipment upgrade project at Miami Fort Station was approved under PTI 14-05559, issued on August 27, 2004, for the installation of a FGD system (scrubbers) and exhaust stack which resulted in a change to the flue gas exhaust parameters of the coal-fired boilers (emissions units B015 and B016). Based upon modeling performed by the permittee, the change in the exhaust parameters had the potential of increasing the ambient air impact for SO<sub>2</sub> greater than 15 ug/m<sup>3</sup> as a 24-hour average. This increase triggered a state-only requirement for a permit modification pursuant to the definition of modification under OAC rule 3745-31-01(SSS)(1)(b) and requirements under OAC rule 3745-31-02(A)(1)(a). Per OAC rule 3745-31-05(A)(3)(a)(iii), this type of modification did not trigger best available technology requirements for these emissions units.



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The permittee provided an air dispersion modeling assessment for the existing coal-fired boilers with the application for PTI 14-05559 in accordance with the requirements of Ohio EPA's Engineering Guide #69, dated 2003. The modeling submitted by the permittee demonstrated that the increase in SO<sub>2</sub> concentration from this emissions unit B016 as a result of the control equipment upgrade project, included in the allowable SO<sub>2</sub> emission rate specified in b)(1)e. and b)(1)f., will not cause or contribute to a violation of a National Ambient Air Quality Standard (NAAQS) and/or Prevention of Significant Deterioration (PSD) increment violation.

*(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-02(A), and 3745-31-01(SSS)(1)(b))*

**3. F001, Coal Unloading and Transfer**

**Operations, Property and/or Equipment Description:**

coal unloading, handling, transfer, and conveying

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) (PTI 14-05762, issued 11/17/2005)	PE shall not exceed 3.58 pounds per hour and 15.69 TPY.  PM <sub>10</sub> emissions and PM <sub>2.5</sub> emissions shall not exceed 1.81 pounds per hour and 7.94 TPY.  See b)(2)b.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B), OAC rule 3745-17-08(B), and 40 CFR 60, Subpart Y.
b.	OAC rule 3745-17-07(B)(7)(b)	Visible particulate emissions shall not exceed 20% opacity, as a 3-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.  See b)(2)a.
d.	40 CFR Part 60, Subpart Y [40 CFR 60.250-60.258]  <i>Standards of Performance for Coal Preparation and Processing Plants</i>  [In accordance with 40 CFR 60.250(b) and 60.251, this emissions	The owner or operator shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system or coal transfer and loading system gases which exhibit 20 percent opacity or greater.  The opacity limitation specified by this



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	unit is comprised of coal processing and conveying equipment and transfer and loading systems that commenced construction or modification after October 27, 1974 and on or before April 28, 2008, and are subject to the emission limitations and/or control measures specified in this section.]	rule is less stringent than the opacity limitation for fugitive dust established pursuant to OAC rule 3745-17-07(B). The permittee shall comply with all applicable emission limitations (including any less stringent emission limitation).  See b)(2)c.
e.	40 CFR 60.1 – 19 [40 CFR 60.1(a)]	The provisions of Subpart A apply to the owner or operator of any stationary source which contains an affected facility that commenced construction or modification after the date of publication in 40 CFR Part 60 that is applicable to that facility.

(2) Additional Terms and Conditions

- a. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the visible emission limitation specified in b)(1)b.

In accordance with the permittee’s permit application, the permittee has committed to utilizing total enclosures, partial enclosures, dust suppression chemicals, and/or a combination of these control measures in order to minimize or eliminate visible particulate emissions of fugitive dust from the material handling operations. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- b. The hourly emission limitations outlined in term b)(1)a. above for PE, PM<sub>10</sub>, and PM<sub>2.5</sub> reflect the emissions unit’s potential to emit (PTE). The annual emission limitations outlined in term b)(1)a. above for PE, PM<sub>10</sub>, and PM<sub>2.5</sub> are based on the hourly PTE assuming 8,760 hours per year of operation. Therefore, no hourly records or annual records are required to demonstrate compliance with these limits.
- c. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each coal unloading, handling, transfer, and conveying operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
Coal unloading stations	Weekly
Coal conveyors	Weekly
Coal handling operations	Weekly
Coal transfer points	Weekly

The inspections shall be performed during representative, normal operating conditions.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(A)(3))*

- (2) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information under item (d) above shall be kept separately for (i) the coal unloading stations, (ii) the coal conveyors, (iii) the coal handling operations, and (iv) the coal transfer points, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(A)(3))*

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05762, issued on November 17, 2005: d)(1) – d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
- a. each day during which an inspection was not performed by the required frequency; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(A)(3))*

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

60.7 and 60.258(b)	Notification and reporting requirements
60.258(c) and (d)	Submission of performance tests

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 60, Subpart Y)*

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05762, issued on November 17, 2005: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 3.58 pounds per hour and 15.69 TPY.  
 PM<sub>10</sub> emissions and PM<sub>2.5</sub> emissions shall not exceed 1.81 pounds per hour and 7.94 TPY.



Applicable Compliance Method:

The hourly emission limitations above reflect the emission unit's maximum potential to emit and are derived from the AP-42 emissions factors, control efficiencies, and the operational parameters as submitted by the permittee in the application for PTI 14-05762, submitted August 26, 2005. The annual emission limitations above are based upon the maximum hourly potential to emit, at 8,760 hours per year, and dividing by 2000 pounds per ton.

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

b. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitations listed above shall be determined 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") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(3) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(7)(b), and OAC rule 3745-31-05(A)(3))*

c. Emission Limitation:

The owner or operator shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system or coal transfer and loading system gases which exhibit 20 percent opacity or greater.

Applicable Compliance Method:

The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 60, Subpart Y, including the following sections:

60.255(a)	Performance testing
60.257(a)	Test methods and procedures

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 60, Subpart Y)*



- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05762, issued on November 17, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
  
- g) Miscellaneous Requirements
  - (1) None.

**4. F002, Coal Storage Piles**

**Operations, Property and/or Equipment Description:**

load-in, load-out, pile working and wind erosion from coal storage piles

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(B)(7)(b)	Visible particulate emissions for coal load-in or coal load-out from any coal storage pile shall not exceed 20% opacity, as a 3-minute average.
b.	OAC rule 3745-17-07(B)(7)(c)	Visible particulate emissions from vehicle operation* on top of any coal storage pile shall not exceed 20% opacity, as a 3-minute average.  *excludes emissions from the combustion of fuels in such vehicles.
c.	OAC rule 3745-17-07(B)(7)(d)	There shall be no visible particulate emissions from any coal storage pile due to wind erosion, except for a period of time not to exceed 13 minutes during any 60-minute observation period.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.  See b)(2)a. – b)(2)c.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) and storage piles for the purpose of ensuring compliance with the visible emission limitations specified in b)(1)a., b)(1)b., and b)(1)c. above.



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In accordance with the permittee's permit application, the permittee has committed to utilizing work practices, water, dust suppression chemicals, and/or a combination of these control measures in order to minimize or eliminate visible particulate emissions of fugitive dust from the material handling operations and storage piles. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- b. The control measure(s) in b)(2)a. shall be employed for each load-in and load-out operation and working vehicle operation on any storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- c. The control measure(s) in b)(2)a. shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in and load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in/load-out inspection frequency</u>
all	weekly

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each working vehicle operation on each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum working vehicle inspection frequency</u>
all	weekly

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
all	weekly

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

- (4) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, working vehicles on a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

- (5) The permittee shall maintain records of the following information:
- the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - the dates the control measures were implemented; and
  - on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d)(5)d. shall be kept separately for (i) the load-in and load-out operations, (ii) the working vehicle operation on the storage pile, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:



- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

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:

Visible particulate emissions for coal load-in or coal load-out from any coal storage pile shall not exceed 20% opacity, as a 3-minute average.

Visible particulate emissions from vehicle operation on top of any coal storage pile shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitations listed above shall be determined 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") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(3) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)(7))*

- b. Emission Limitation:

There shall be no visible particulate emissions from any coal storage pile due to wind erosion, except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitations listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary



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Sources") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(4) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)(7))*

g) Miscellaneous Requirements

- (1) None.

**5. F003, Plant Roadways and Parking**

**Operations, Property and/or Equipment Description:**

paved and unpaved roadways and parking areas

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(B)(7)(a)(ii)	No visible particulate emissions from any paved roadway or parking area, except for a period of time not to exceed 6 minutes during any 60-minute observation period.  No visible particulate emissions from any unpaved roadway or parking area, except for a period of time not to exceed 13 minutes during any 60-minute observation period.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.  See b)(2)a. – b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures for the above-identified roadways and parking areas for the purpose of ensuring compliance with the visible emission limitations specified in b)(1)a. above:

i. In accordance with the permittee’s permit application, the permittee has committed to utilizing work practices, water, dust suppression chemicals, and/or a combination of these control measures in order to minimize or eliminate visible particulate emissions of fugitive dust from the roadways and parking areas. Nothing in this paragraph shall prohibit the permittee



from employing other equally-effective control measures to ensure compliance.

- ii. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- iii. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

b. The needed frequencies of implementation of the control measures in b)(2)a.i. shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved and unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>roadways and parking areas</u>	<u>minimum inspection frequency</u>
all paved roads and parking areas	daily, when in use
all unpaved roads and parking areas	daily, when in use

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended.

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

(3) The permittee may, upon receipt of written approval from the Southwest Ohio Air Quality Agency, modify the inspection frequencies in d)(1) if operating experience indicates than

less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements for fugitive dust.

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

(4) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(4)d. shall be kept separately for (i) the paved roadways and parking areas, and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

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:

No visible particulate emissions from any paved roadway or parking area, except for a period of time not to exceed 6 minutes during any 60-minute observation period.

No visible particulate emissions from any unpaved roadway or parking area, except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitations listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(4) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)(7))*

g) Miscellaneous Requirements

- (1) None.

**6. F004, Ash Ponds**

**Operations, Property and/or Equipment Description:**

unloading of fly ash and or bottom ash at ash basins, truck loading and ash handling and wind erosion at ash basins

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(B)(7)(b)	Visible particulate emissions from any material handling operation (ash unloading, loading, handling) shall not exceed 20% opacity, as a 3-minute average.
b.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from wind erosion on the ash basins shall not exceed 20% opacity, as a 3-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.  See b)(2)a. – b)(2)c.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the visible emission limitations specified in b)(1)a. and b)(1)b. above.

In accordance with the permittee’s permit application, the permittee has committed to apply sufficient water at the dry ash storage silos associated with emissions units F005 and F006 to keep the materials moist at the ash basins, cover the deposited ash with earth, and plant vegetation on the surface of any filled deposited areas, and/or a combination of these control measures, in order to minimize or eliminate visible particulate emissions of fugitive dust from the ash



Effective Date: To be entered upon final issuance

handling operations. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- b. The control measure(s) in b)(2)a. shall be employed for each load-in and load-out operation and ash handling operation if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- c. The control measure(s) in b)(2)a. shall be employed for wind erosion from each ash basin if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for an ash basin that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in, load-out, and ash handling operation in accordance with the following frequencies:

<u>Material handling operations</u>	<u>minimum inspection frequency</u>
all	weekly

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from ash basin surfaces associated with each ash basin in accordance with the following frequencies:

<u>Ash basin identification</u>	<u>minimum wind erosion inspection frequency</u>
all	weekly

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

- (3) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in, load-out and handling, and wind erosion from the surface of the ash basins. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for wind erosion from the surface of ash basin when the basin is covered with snow and/or ice

and for any ash basin activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

- (4) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from ash basin surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d)(4)d. shall be kept separately for (i) the load-in, load-out, and handling operations, and (ii) the ash basin surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B))*

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:

Visible particulate emissions from any material handling operation (ash unloading, loading, handling) shall not exceed 20% opacity, as a 3-minute average.

Visible particulate emissions from wind erosion on the ash basins shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitations listed above shall be determined 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") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(3) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(1), and OAC rule 3745-17-07(B)(7))*

g) Miscellaneous Requirements

- (1) None.

**7. F005, Unit 7 Fly Ash Loading and Transfer**

**Operations, Property and/or Equipment Description:**

Fly ash unloading, transfer and conveying for Unit 7

- 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) (PTI 14-05010, issued 9/18/2001)	PE shall not exceed 10.43 pounds per hour and 5.22 TPY.  PM <sub>10</sub> emissions shall not exceed 4.94 pounds per hour and 2.47 TPY.  See b)(2)a. and b)(2)b.  Compliance with the requirements of this rule includes compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)(3).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stacks (i.e. fabric filters/baghouses) serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(7)(b)	Visible particulate emissions from any material handling operation shall not exceed 20% opacity, as a 3-minute average.
d.	OAC rule 3745-17-08(B)(3)	PE shall not exceed 0.03 grain/dry standard cubic foot from each of the control devices (fabric filters/baghouses) serving this emissions unit.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall employ the following control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the emission limitations specified in b)(1)a. and b)(1)c. above:

In accordance with the permittee's permit application, the permittee has committed to:

- i. total enclosure of pneumatic conveying equipment,
- ii. enclosure of tanker truck(s), weigh hopper, and railcar loading areas and venting the displaced air from the loading operations to the storage silo baghouse(s) with a minimum control efficiency of at least 99%,
- iii. application of water or dust suppression chemicals,
- iv. mixing fly ash with water prior to loading into dump trucks,
- v. and/or a combination of these control measures in order to minimize or eliminate visible particulate emissions of fugitive dust.

Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- b. The hourly and annual emission limitations outlined in term b)(1)a. above for PE and PM<sub>10</sub> reflect the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 10.0 inches of water.

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

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled

emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse(s) on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range on the pressure drop across the baghouse(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range will

not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-31-05(A)(3))*

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the fugitive egress points (i.e. pneumatic conveying points, unloading enclosure openings) for this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-31-05(A)(3))*

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05010, issued on September 18, 2001: d)(1) – d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse(s) was outside of the acceptable range;

- b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse(s);
- c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
- e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- f. all days during which any visible particulate emissions were observed from the baghouse stacks serving this emissions unit;
- g. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., pneumatic conveyor points, enclosure openings, etc.) serving this emissions unit; and
- h. any corrective actions taken to minimize or eliminate the visible emissions identified in “f” and “g”.

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-31-05(A)(3))*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05010, issued on September 18, 2001: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 10.43 pounds per hour and 5.22 TPY.  
  
PM<sub>10</sub> emissions shall not exceed 4.94 pounds per hour and 2.47 TPY.



Applicable Compliance Method:

The hourly and annual emission limitations above reflect the potential to emit and are based upon the maximum material handling capacities of the handling system and the flyash generation rate, in tons per hour and tons per year, and the control efficiencies and emission factors derived from AP-42 Section 13.2.4, as submitted by the permittee in the application for PTI 14-05010, submitted August 28, 2000.

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

b. Emission Limitations:

Visible particulate emissions from the stacks (i.e. fabric filters/baghouses) serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Visible particulate emissions from any material handling operation shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible stack and fugitive dust limitations listed above shall be determined 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") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(3) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-07(A)(1), and OAC rule 3745-17-07(B)(7))*

c. Emission Limitation:

PE shall not exceed 0.03 grain/dry standard cubic foot from each of the control devices (fabric filters/baghouses) serving this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation above shall be determined through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.



No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05010, issued on September 18, 2001: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

**8. F006, Unit 8 Fly Ash Loading and Transfer**

**Operations, Property and/or Equipment Description:**

Fly ash unloading, transfer and conveying for Unit 8

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) (PTI 14-05189, issued 8/30/2001)	PE shall not exceed 0.79 pound per hour and 0.32 TPY.  PM <sub>10</sub> emissions shall not exceed 0.36 pound per hour and 0.15 TPY.  See b)(2)a. and b)(2)b.  Compliance with the requirements of this rule includes compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)(3).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stacks (i.e. fabric filters/baghouses) serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(7)(b)	Visible particulate emissions from any material handling operation shall not exceed 20% opacity, as a 3-minute average.
d.	OAC rule 3745-17-08(B)(3)	PE shall not exceed 0.03 grain/dry standard cubic foot from each of the control devices (fabric filters/baghouses) serving this emissions unit.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall employ the following control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the emission limitations specified in b)(1)a. and b)(1)c. above:

In accordance with the permittee's permit application, the permittee has committed to:

- i. total enclosure of pneumatic conveying equipment,
- ii. enclosure of tanker truck(s), weigh hopper, and railcar loading areas and venting the displaced air from the loading operations to the storage silo baghouse(s) with a minimum control efficiency of at least 99%,
- iii. application of water or dust suppression chemicals,
- iv. mixing fly ash with water prior to loading into dump trucks,
- v. and/or a combination of these control measures in order to minimize or eliminate visible particulate emissions of fugitive dust.

Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- b. The hourly and annual emission limitations outlined in term b)(1)a. above for PE and PM<sub>10</sub> reflect the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 10.0 inches of water.

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

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled

emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse(s) on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range on the pressure drop across the baghouse(s) is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range will

not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-31-05(A)(3))*

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the fugitive egress points (i.e. pneumatic conveying points, unloading enclosure openings) for this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-31-05(A)(3))*

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05189, issued on August 30, 2001: d)(1) – d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse(s) was outside of the acceptable range;

- b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse(s);
- c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- f. all days during which any visible particulate emissions were observed from the baghouse stacks serving this emissions unit;
- g. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., pneumatic conveyor points, enclosure openings, etc.) serving this emissions unit; and
- h. any corrective actions taken to minimize or eliminate the visible emissions identified in “f” and “g”.

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-31-05(A)(3))*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05189, issued on August 30, 2001: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 0.79 pound per hour and 0.32 TPY.  
  
PM<sub>10</sub> emissions shall not exceed 0.36 pound per hour and 0.15 TPY.



Applicable Compliance Method:

The hourly and annual emission limitations above reflect the potential to emit and are based upon the maximum material handling capacities of the handling system and the flyash generation rate, in tons per hour and tons per year, and the control efficiencies and emission factors derived from AP-42 Section 13.2.4, as submitted by the permittee in the application for PTI 14-05189, submitted July 11, 2001.

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

b. Emission Limitations:

Visible particulate emissions from the stacks (i.e. fabric filters/baghouses) serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Visible particulate emissions from any material handling operation shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible stack and fugitive dust limitations listed above shall be determined 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") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(3) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-07(A)(1), and OAC rule 3745-17-07(B)(7))*

c. Emission Limitation:

PE shall not exceed 0.03 grain/dry standard cubic foot from each of the control devices (fabric filters/baghouses) serving this emissions unit.

Applicable Compliance Method:

Compliance with the emission limitation above shall be determined through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.



No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05189, issued on August 30, 2001: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



**9. F007, FGD Material Handling Roadways**

**Operations, Property and/or Equipment Description:**

FGD material handling paved and unpaved roadways

- 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  (PTI P0107421, issued 5/26/2011)	For paved roadways:  No visible particulate emissions, except for one minute during any 60-minute period.  For unpaved roadways:  No visible particulate emissions, except for 3 minutes during any 60-minute period.  Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [see b)(2)e. and b)(2)f., and b)(2)h. through b)(2)k.].  See b)(2)a.  The requirements of this rule also include compliance with the requirements OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, PM <sub>10</sub> , PM <sub>2.5</sub> , and visible particulate emissions from these air contaminant sources since the potential to emit is each less than 10

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>tons/year taking into account the federally enforceable restrictions in b)(1)c.</p> <p>See b)(2)b.</p>
c.	<p>OAC rule 3745-31-05(D)          June 30, 2008</p> <p>(PTI P0107421, issued 5/26/2011)</p> <p><i>Synthetic Minor to avoid Prevention of Significant Deterioration New Source Review</i></p>	<p>PE from the paved roadways shall not exceed 10.18 TPY.</p> <p>PM<sub>10</sub> emissions from the paved roadways shall not exceed 2.83 TPY.</p> <p>PM<sub>2.5</sub> emissions from the paved roadways shall not exceed 0.50 TPY (from temporary gypsum storage pile handling and transport roadways).</p> <p>PE from the unpaved roadways shall not exceed 8.15 TPY.</p> <p>PM<sub>10</sub> emissions from the unpaved roadways shall not exceed 2.34 TPY.</p> <p>PM<sub>2.5</sub> emissions from the unpaved roadways shall not exceed 0.31 TPY (from temporary gypsum storage pile handling and transport roadways).</p> <p>See b)(2)l.</p>
d.	<p>OAC rule 3745-17-07(B)(7)(a)(ii)</p>	<p>No visible particulate emissions from any paved roadway or parking area, except for a period of time not to exceed 6 minutes during any 60-minute observation period.</p> <p>No visible particulate emissions from any unpaved roadway or parking area, except for a period of time not to exceed 13 minutes during any 60-minute observation period.</p> <p>The opacity emission limitations specified in this rule are less stringent than the opacity emission limitations established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)a. and b)(2)b.</p>
e.	<p>OAC rule 3745-17-08(B)</p>	<p>Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a. , b)(2)b., and b)(2)g. through b)(2)k.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) emission limitations and control measures for visible particulate emissions specified in b)(1)a. above apply until U.S. EPA approves 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: PE, PM<sub>10</sub>, PM<sub>2.5</sub>, and visible particulate emission limitations and control measures specified in b)(1)c., b)(1)d., b)(1)e., and b)(2)g. through b)(2)k.
- c. The paved roadways that are covered by this permit and subject to the above-mentioned requirements are listed below:  
  
 paved roadways:  
  
 B - Gypsum Storage Building/Front End Loader  
  
 C - Gypsum Emergency Stock-out Pile  
  
 D - Dump Truck/Gypsum Station/Temporary Gypsum Storage Pile/Transport  
  
 E - Dumpster Truck/Inerts Station
- d. The unpaved roadways that are covered by this permit and subject to the above-mentioned requirements are listed below:  
  
 unpaved roadways:  
  
 A - Limestone Storage Pile Areas  
  
 C - Dump Truck/Gypsum Station/Temporary Gypsum Storage Pile/Transport
- e. The permittee shall employ best available control measures on all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways by water flushing at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- f. The permittee shall employ best available control measures on all unpaved roadways for the purpose of ensuring compliance with the above-mentioned



applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways with watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- g. The permittee shall employ reasonably available control measures for the above-identified roadways for the purpose of ensuring compliance with the visible emission limitations specified in b)(1)d. above. In accordance with the permittee's permit application, the permittee has committed to treat the roadways with water in order to minimize or eliminate visible particulate emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- h. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- i. Any unpaved roadway, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway that takes the characteristics of a paved roadway due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways. Any unpaved roadway that is paved shall be subject to the visible emission limitation for paved roadways.
- j. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- k. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- l. The annual emissions limitations outlined above in b)(1)c. reflect that emissions unit F007 is bottlenecked by the maximum material throughput limitations established for emissions units F009 and F010 in the terms and conditions of this Title V permit action, and the terms and conditions of the underlying federally-enforceable PTIs for emissions units F009 and F010.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways in accordance with the following frequencies:

<u>paved roadways</u>	<u>minimum inspection frequency</u>
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B - Gypsum Storage Building/Front End Loader	weekly
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C - Gypsum Emergency Stock-out Pile	weekly
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D - Dump Truck/Gypsum Station/ Temporary Gypsum Storage Pile/Transport	weekly
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E - Dumpster Truck/Inerts Station	weekly
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<u>unpaved roadways</u>	<u>minimum inspection frequency</u>
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A - Limestone Storage Pile Areas	weekly
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C - Dump Truck/Gypsum Station/ Temporary Gypsum Storage Pile/Transport	weekly
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*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

(3) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and

- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d. shall be kept separately for (i) the paved roadways and (ii) the unpaved roadways, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

- (4) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the actual or estimated monthly vehicle miles traveled; and
  - b. the total emissions, in tons, for PE/PM<sub>10</sub>/PM<sub>2.5</sub> for each month.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #P0107421, issued on May 26, 2011: d)(1) – d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

- (2) The permittee shall submit annual reports that specify the total PE/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from this emissions unit for the calendar year. These reports shall be submitted by April



15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #P0107421, issued on May 26, 2011: e)(1) – e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

- For paved roadways:

- No visible particulate emissions, except for one minute during any 60-minute period.

- For unpaved roadways:

- No visible particulate emissions, except for 3 minutes during any 60-minute period.

- Applicable Compliance Method:

- Compliance with the visible fugitive dust limitations listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(4) of OAC rule 3745-17-03.

- No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

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

- b. Emission Limitations:

- No visible particulate emissions from any paved roadway or parking area, except for a period of time not to exceed 6 minutes during any 60-minute observation period.



No visible particulate emissions from any unpaved roadway or parking area, except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitations listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(4) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)(7))*

c. Emission Limitations:

PE from the paved roadways shall not exceed 10.18 TPY.

PM<sub>10</sub> emissions from the paved roadways shall not exceed 2.83 TPY.

PM<sub>2.5</sub> emissions from the paved roadways shall not exceed 0.50 TPY.

Applicable Compliance Method:

Compliance shall be determined using the following equations and the associated record keeping requirements in d)(5):

$$\text{tons PE/yr} = (A) \times (B) \times (1-C) \times 1 \text{ ton}/2000 \text{ lbs}$$

$$\text{tons PM}_{10}/\text{yr} = (A) \times (B) \times (1-C) \times 1 \text{ ton}/2000 \text{ lbs}$$

$$\text{tons PM}_{2.5}/\text{yr} = (A) \times (B) \times (1-C) \times 1 \text{ ton}/2000 \text{ lbs}$$

where,

A = PE, PM<sub>10</sub> or PM<sub>2.5</sub> emission factor, lb/VMT, calculated from AP-42, Section 13.2.1 (January, 2011)

B = annual vehicle miles traveled (VMT)

C = control efficiency, for paved roadways, from operational parameters outlined in PTI applications 14-05585, received June 22, 2004, and A0041015, received January 7, 2011.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*



d. Emission Limitations:

PE from the unpaved roadways shall not exceed 8.15 TPY.

PM<sub>10</sub> emissions from the unpaved roadways shall not exceed 2.34 TPY.

PM<sub>2.5</sub> emissions from the unpaved roadways shall not exceed 0.31 TPY.

Applicable Compliance Method:

Compliance shall be determined using the following equations and the associated record keeping requirements in d)(5):

$$\text{tons PE/yr} = (A) \times (B) \times (1-C) \times 1 \text{ ton}/2000 \text{ lbs}$$

$$\text{tons PM}_{10}/\text{yr} = (A) \times (B) \times (1-C) \times 1 \text{ ton}/2000 \text{ lbs}$$

$$\text{tons PM}_{2.5}/\text{yr} = (A) \times (B) \times (1-C) \times 1 \text{ ton}/2000 \text{ lbs}$$

where,

A = PE, PM<sub>10</sub>, or PM<sub>2.5</sub> emission factor, lb/VMT, calculated from AP-42, Section 13.2.2 (December, 2003)

B = annual vehicle miles traveled (VMT)

C = control efficiency, for unpaved roadways, from operational parameters outlined in PTI applications 14-05585, received June 22, 2004, and A0041015, received January 7, 2011.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #P0107421, issued on May 26, 2011: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

**10. F008, FGD Material Handling Storage Piles**

**Operations, Property and/or Equipment Description:**

FGD material handling storage piles

- 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  (PTI P0107421, issued 5/26/2011)	No visible particulate emissions, except for one minute during any 60-minute period.  Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [see b)(2)d., b)(2)e., b)(2)g., and b)(2)h.].  See b)(2)a.  The requirements of this rule also include compliance with the requirements OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, PM <sub>10</sub> , PM <sub>2.5</sub> , and visible particulate emissions from these air contaminant sources since the potential to emit is each less than 10 tons/year taking into account the federally enforceable restrictions in b)(1)c.  See b)(2)b.
c.	OAC rule 3745-31-05(D) June 30, 2008  (PTI P0107421, issued 5/26/2011)	PE from the material handling system storage piles - load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 1.48 TPY.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<i>Synthetic Minor to avoid Prevention of Significant Deterioration New Source Review</i>	<p>PM<sub>10</sub> emissions from the material handling system storage piles - load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 0.76 TPY.</p> <p>PM<sub>2.5</sub> emissions from the material handling system storage piles - load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 0.20 TPY (from temporary gypsum storage piles handling, load-in, load-out and wind erosion).</p> <p>See b)(2)i.</p>
d.	OAC rule 3745-17-07(B)(6)	<p>There shall be no visible emissions of fugitive dust from the material storage piles (from wind erosion), except for a period of time not to exceed 13 minutes during any 60-minute observation period.</p> <p>The opacity emission limitation specified in this rule is less stringent than the opacity emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)a. and b)(2)b.</p>
e.	OAC rule 3745-17-07(B)(7)(b)	<p>Visible particulate emissions for load-in or load-out from any material storage pile shall not exceed 20% opacity, as a 3-minute average.</p> <p>The opacity emission limitation specified in this rule is less stringent than the opacity emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)a. and b)(2)b.</p>
f.	OAC rule 3745-17-08(B)	<p>Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)a., b)(2)b., and b)(2)f. through b)(2)h.</p>

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) emission limitations and control measures for visible particulate emissions specified in b)(1)a. above apply until U.S. EPA approves 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: PE, PM<sub>10</sub>, PM<sub>2.5</sub>, and visible particulate emission limitations and control measures specified in b)(1)c., b)(1)d., b)(1)e., b)(1)f., and b)(2)f. through b)(2)h.
- c. The storage piles that are covered by this permit and subject to the above-mentioned requirements are listed below:
  - A - Limestone (active storage pile);
  - B - Limestone (inactive storage pile);
  - C - Gypsum (active and temporary gypsum storage pile);
  - D - Gypsum (emergency stock-out pile); and,
  - E - Inerts storage.
- d. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to the use of telescopic chute, maintaining material moisture content, precautionary measures and partial enclosure in order to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- e. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintaining the material moisture content, precautionary measures and partial enclosure in order to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- f. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) and storage piles for the purpose of ensuring compliance with the visible emission limitations specified in b)(1)d. and b)(1)e. above. In accordance with the permittee's permit application, the permittee has committed to telescopic chute, maintaining material moisture content, precautionary measures and partial enclosures and/or a combination of these control measures in order to minimize or eliminate visible particulate emissions of fugitive dust from the material handling operations and storage



piles. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- g. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- h. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- i. The annual emissions limitations outlined above in b)(1)c. reflect that emissions unit F008 is bottlenecked by the maximum material throughput limitations established for emissions units F009 and F010 in the terms and conditions of this Title V permit action, and the terms and conditions of the underlying federally-enforceable PTIs for emissions units F009 and F010.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in and load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in/load-out inspection frequency</u>
------------------------------------	--

- |   |        |
|---|--------|
| A - Limestone (active storage pile)                   | weekly |
| B - Limestone (inactive storage pile)                 | weekly |
| C - Gypsum (active and temporary gypsum storage pile) | weekly |
| D - Gypsum (emergency stock-out pile)                 | weekly |
| E - Inerts storage                                    | weekly |

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification      minimum wind erosion inspection frequency

A - Limestone (active storage pile)	weekly
B - Limestone (inactive storage pile)	weekly
C - Gypsum (active and temporary gypsum storage pile)	weekly
D - Gypsum (emergency stock-out pile)	weekly
E - Inerts storage	weekly

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

- (3) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

- (4) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d)(4)d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

- (5) The permittee shall maintain monthly records of the total emissions, in tons, for PE/PM<sub>10</sub>/PM<sub>2.5</sub>.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #P0107421, issued on May 26, 2011: d)(1) – d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:

- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-08(B))*

- (2) The permittee shall submit annual reports that specify the total PE/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #P0107421, issued on May 26, 2011: e)(1) – e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

No visible particulate emissions, except for one minute during any 60-minute period.

There shall be no visible emissions of fugitive dust from the material storage piles (from wind erosion), except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitations listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(4) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-17-07(B)(6))*

b. Emission Limitation:

Visible particulate emissions for load-in or load-out from any material storage pile shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitation listed above shall be determined 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") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(3) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)(7))*

c. Emission Limitations:

PE from the material handling system storage piles - load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 1.48 TPY.

PM<sub>10</sub> emissions from the material handling system storage piles - load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 0.76 TPY.

PM<sub>2.5</sub> emissions from the material handling system storage piles - load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 0.20 TPY (from temporary gypsum storage piles handling, load-in, load-out and wind erosion).

Applicable Compliance Method:

Compliance with the annual limitations shall be demonstrated by the emission factors from AP-42 Sections 11.19, 13.2.4, and 13.2.5, control efficiencies (moisture content, partial enclosure, Ohio EPA RACM document), and the operational parameters as submitted in PTI applications 14-05585, received June 22, 2004, and A0041015, received January 7, 2011, and the record keeping requirement in d)(5).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #P0107421, issued on May 26, 2011: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

**11. F009, Limestone Handling System**

**Operations, Property and/or Equipment Description:**

FGD material handling, transfer and conveying - Limestone handling system

- 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) (PTI 14-05585, issued 10/21/2004)	PE shall not exceed 30.13 pounds per hour.  PM <sub>10</sub> emissions shall not exceed 22.89 pounds per hour. \See b)(2)b. – b)(2)d.  Compliance with the requirements of this rule includes compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)  <i>Synthetic Minor to avoid Prevention of Significant Deterioration New Source Review</i>	PE shall not exceed 9.02 TPY, based upon a rolling, 12-month summation.  PM <sub>10</sub> emissions shall not exceed 8.03 TPY, based upon a rolling, 12-month summation.  See c)(1).
c.	OAC rule 3745-17-07(B)(7)(b)	Visible particulate emissions from any material handling operation shall not exceed 20% opacity, as a 3-minute average.
d.	OAC rule 3745-17-08(B)	The reasonably available control measures for fugitive dust specified by this rule are equivalent to, or less stringent than, the best available control measures specified pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

Limestone handling system, from the barge unloading through the handling process to Units 7 and 8 Mill Product Tanks, exclusive of the storage piles, as described in the application for PTI 14-05585, received on June 22, 2004.

- b. The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
limestone handling system	a combination of precautionary measures, water sprays, partial enclosure, telescopic chute, full enclosure and full enclosure with baghouse vented inside the building.

Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- c. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- d. The hourly emission limitations outlined in term b)(1)a. above for PE and PM<sub>10</sub> reflect the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The maximum annual throughput for this emissions unit shall not exceed 569,400 tons of limestone, based upon a rolling, 12-month summation of the throughput rates.

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and OAC rule 3745-31-05(A)(3))*

d) Monitoring and/or Recordkeeping Requirements

- (1) For each limestone unloading, handling, transfer, and conveying operation that is not adequately enclosed, the permittee shall perform inspections of such material

processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

material handling operation(s)    minimum inspection frequency

Limestone handling system        weekly

The above-mentioned inspections shall be performed during representative, normal operating conditions.

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

- (2) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
  - c. the dates the control measure(s) was (were) implemented; and
  - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in d)(2)d. above shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

- (3) The permittee shall maintain monthly records of the following information for this emissions unit in order to demonstrate compliance with the rolling, 12-month summation emission limitations:
- a. the material throughput for each month;
  - b. the rolling, 12-month summation of the material throughput (the total amount of material throughput for the current month plus the total amount of material throughput for the previous eleven calendar months);
  - c. the total emissions, in tons, for PE and PM<sub>10</sub> for each month; and
  - d. the updated rolling, 12-month summation emissions total, in tons, for PE and PM<sub>10</sub> for each month (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05585, issued on

October 21, 2004: d)(1) – d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify the following:
  - a. each day during which an inspection was not performed by the required frequency;
  - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented;
  - c. an identification of all exceedances of the rolling, 12-month material throughput restriction; and,
  - d. an identification of all exceedances of the rolling, 12-month emission limitations for PE and PM<sub>10</sub>.

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (2) The permittee shall submit annual reports that specify the total PE and PM<sub>10</sub> emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-05585, issued on October 21, 2004: e)(1) – e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 30.13 pounds per hour.

PM<sub>10</sub> emissions shall not exceed 22.89 pounds per hour.

Applicable Compliance Method:

The hourly emission limitations above reflect the potential to emit and are based upon the maximum material handling capacities of the handling system, in tons per hour, and the control efficiencies and emission factors derived from AP-42 Section 13.2.4 and Section 11.19, as submitted by the permittee in the application for PTI 14-05585, submitted June 22, 2004.

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

b. Emission Limitations:

PE shall not exceed 9.02 TPY, based upon a rolling, 12-month summation.

PM<sub>10</sub> emissions shall not exceed 8.03 TPY, based upon a rolling, 12-month summation.

Applicable Compliance Method:

The annual emission limitations above are based upon the material throughput limitation of 569,400 tons per year and the control efficiencies and emission factors derived from AP-42 Section 13.2.4 and Section 11.19, as submitted by the permittee in the application for PTI 14-05585, submitted June 22, 2004. Compliance shall be determined by the record keeping specified in d)(3).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and OAC rule 3745-31-05(A)(3))*

c. Emission Limitation:

Visible particulate emissions from any material handling operation shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitation listed above shall be determined 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") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(3) of OAC rule 3745-17-03.



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

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(7), and OAC rule 3745-31-05(A)(3))*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05585, issued on October 21, 2004: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

**12. F010, Gypsum Handling System**

**Operations, Property and/or Equipment Description:**

FGD material handling, transfer and conveying - Gypsum handling system

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  (PTI P0107421, issued 5/26/2011)	PE from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.61 pound per hour.  PM <sub>10</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.34 pound per hour.  PM <sub>2.5</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.02pound per hour (from temporary gypsum material handling system, transfer and conveying - gypsum handling).  See b)(2)a. and b)(2)f.  The requirements of this rule also include compliance with the requirements OAC rule 3745-31-05(D), OAC rule 3745-17-07(B)(7), and OAC rule 3745-17-08.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, PM <sub>10</sub> , PM <sub>2.5</sub> , and visible particulate emissions from these air contaminant sources since

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>the potential to emit is each less than 10 tons/year taking into account the federally enforceable restrictions in b)(1)c.</p> <p>See b)(2)b.</p>
c.	<p>OAC rule 3745-31-05(D)</p> <p><i>Synthetic Minor to avoid Prevention of Significant Deterioration New Source Review</i></p>	<p>PE from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.66 TPY, based upon a rolling, 12-month summation.</p> <p>PM<sub>10</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.40 TPY, based upon a rolling, 12-month summation.</p> <p>PM<sub>2.5</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.01 TPY, based upon a rolling, 12-month summation (from temporary gypsum storage piles material handling system, transfer and conveying - gypsum handling).</p> <p>See c)(1).</p>
d.	OAC rule 3745-17-07(B)(7)(b)	Visible particulate emissions from any material handling operation shall not exceed 20% opacity, as a 3-minute average.
e.	OAC rule 3745-17-08(B)	<p>Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)a., b)(2)b., b)(2)d., and b)(2)e.</p>

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) emission limitations and control measures for visible particulate emissions specified in b)(1)a. above apply until U.S. EPA approves 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



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SIP: PE, PM<sub>10</sub>, PM<sub>2.5</sub>, and visible particulate emission limitations and control measures specified in b)(1)c., b)(1)d., b)(1)e., b)(2)d., and b)(2)e.

- c. The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

Gypsum handling system, exclusive of the storage piles, as described in PTI applications 14-05585, received June 22, 2004 and A0041015, received January 7, 2011.

- d. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
gypsum handling system	a combination of partial enclosure, telescopic chute and full enclosure

Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- e. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- f. The hourly emission limitations outlined in b)(1)a. for PE/PM<sub>10</sub>/PM<sub>2.5</sub> are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The maximum annual throughput for this emissions unit shall not exceed 1,033,680 tons of gypsum, based upon a rolling, 12-month summation of the throughput rates.

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and OAC rule 3745-31-05(A)(3))*

d) Monitoring and/or Recordkeeping Requirements

- (1) For material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

material handling operation(s)    minimum inspection frequency

Gypsum handling system            weekly

The above-mentioned inspections shall be performed during representative, normal operating conditions.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(A)(3))*

- (2) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
  - c. the dates the control measure(s) was (were) implemented; and
  - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in d)(2)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(A)(3))*

- (3) The permittee shall maintain monthly records of the following information for this emissions unit in order to demonstrate compliance with the rolling, 12-month summation emission limitations:
- a. the material throughput for each month;
  - b. the rolling, 12-month summation of the material throughput;
  - c. the total emissions, in tons, for PE/PM<sub>10</sub>/PM<sub>2.5</sub> for each month; and
  - d. the updated rolling, 12-month summation emissions total, in tons, for PE/PM<sub>10</sub>/PM<sub>2.5</sub> (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #P0107421, issued on May 26, 2011: d)(1) – d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these

requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify the following:
  - a. each day during which an inspection was not performed by the required frequency;
  - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented;
  - c. an identification of all exceedances of the rolling, 12-month material throughput restriction; and,
  - d. an identification of all exceedances of the rolling, 12-month emission limitations for PE/PM<sub>10</sub>/PM<sub>2.5</sub>.

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-08(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (2) The permittee shall submit annual reports that specify the total PE/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #P0107421, issued on May 26, 2011: e)(1) – e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 particulate emissions from any material handling operation shall not exceed 20% opacity, as a 3-minute average.



Applicable Compliance Method:

Compliance with the visible fugitive dust limitation listed above shall be determined 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") and OAC rule 3745-17-03, including the modifications listed in paragraphs (B)(3) of OAC rule 3745-17-03.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(7), and OAC rule 3745-31-05(A)(3))*

b. Emission Limitations:

PE from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.61 pound per hour.

PM<sub>10</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.34 pound per hour.

PM<sub>2.5</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.02pound per hour (from temporary gypsum material handling system, transfer and conveying - gypsum handling).

Applicable Compliance Method:

The hourly emission limitations above reflect the potentials to emit and are based upon the maximum material handling capacities of the gypsum handling system, in tons per hour, control efficiencies, and emission factors derived from AP-42 Section 13.2.4, as submitted by the permittee in PTI applications 14-05585, received June 22, 2004 and A0041015, received January 7, 2011.

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

c. Emission Limitations:

PE from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.66 TPY, based upon a rolling, 12-month summation.

PM<sub>10</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.40 TPY, based upon a rolling, 12-month summation.

PM<sub>2.5</sub> emissions from the material handling system, transfer and conveying - gypsum handling system shall not exceed 0.01 TPY, based upon a rolling, 12-month summation (from temporary gypsum storage piles material handling system, transfer and conveying - gypsum handling).



Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements in d)(3). The annual emission limitations are based upon the material throughput restriction in c)(1) and are calculated from the material throughput recorded in d)(3), and the control efficiencies and emission factors derived from AP-42 Section 13.2.4, as submitted by the permittee in PTI applications 14-05585, received June 22, 2004 and A0041015, received January 7, 2011.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #P0107421, issued on May 26, 2011: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- g) Miscellaneous Requirements
- (1) None.

**13. Emissions Unit Group - Combustion Turbines: B010, B011, B012, B013**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B010	236 MMBtu/hr No. 2 oil-fired 16.5 MW Combustion Turbine GT-3
B011	236 MMBtu/hr No. 2 oil-fired 16.5 MW Combustion Turbine GT-4
B012	236 MMBtu/hr No. 2 oil-fired 16.5 MW Combustion Turbine GT-5
B013	236 MMBtu/hr No. 2 oil-fired 16.5 MW Combustion Turbine GT-6

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(4)	PE shall not exceed 0.040 pound per MMBtu of actual heat input.
c.	OAC rule 3745-18-37(BB)(4)	SO <sub>2</sub> emissions shall not exceed 0.5 pound per MMBtu of actual heat input.
d.	40 CFR Part 63, Subpart YYYY [40 CFR 63.6080-6175]  National Emissions Standards for Hazardous Air Pollutants for Stationary Combustion Turbines  [In accordance with 40 CFR 63.6090, these emissions units are existing stationary combustion turbines that commenced construction or reconstruction on or before January 14, 2003.]	See b)(2)a.

- (2) Additional Terms and Conditions
- a. In accordance with 63.6090(b)(4), existing stationary combustion turbines in all subcategories do not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary for any existing stationary combustion turbine, even if a new or reconstructed turbine in the same category would require an initial notification.
- c) Operational Restrictions
- (1) The permittee shall burn only No.2 fuel oil in the emissions units.  
*(Authority for term: OAC rule 3745-77-07(A)(1))*
- (2) The quality of the No. 2 oil burned in the emissions units shall have a combination of sulfur content and heat content sufficient to meet the SO<sub>2</sub> emission limitation of 0.5 pound per MMBtu of actual heat input.  
*(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-18-37(BB)(4))*
- d) Monitoring and/or Recordkeeping Requirements
- (1) For each day during which the permittee burns a fuel other than No.2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in the emissions units.  
*(Authority for term: OAC rule 3745-77-07(C)(1))*
- (2) The permittee shall maintain records of the oil burned in the emissions units in accordance with either Alternative 1 or Alternative 2 described below:
- a. Alternative 1:
- For each shipment of oil received for burning in the emissions units, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.
- b. Alternative 2:
- The permittee shall collect a representative grab sample of oil that is burned in each emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving the 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 the emissions unit. A representative grab sample of oil does not need to be collected on days when the emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

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

*(Authority for term: OAC rules 3745-77-07(C)(1), 3745-18-04(E)(3), and 3745-18-04(I))*

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from d)(2) above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

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

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than No. 2 fuel oil was burned in the emissions units. Each report shall be submitted within 30 days after the deviation occurs.

*(Authority for term: 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 particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.



Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation above shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A), and 3745-17-03(B)(1))*

b. Emission Limitation:

PE shall not exceed 0.040 pound per MMBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be determined based upon the particulate emission factor of 0.0043 lb/MMBtu as specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (04/00).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

*(Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-11(B)(4), and 3745-17-03(B))*

c. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 0.5 pound per MMBtu of actual heat input.

Applicable Compliance Method:

Continuous compliance with the allowable pound per MMBtu SO<sub>2</sub> emission limitation above shall be determined by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation in accordance with the monitoring and record keeping specified in d)(2).

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

*(Authority for term: OAC rules 3745-77-07(C)(1), 3745-18-37(BB)(4), and 3745-18-04(E))*



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g) Miscellaneous Requirements

- (1) None.