



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

7/26/2016

Certified Mail

Mr. Anthony Catanese
Avon Lake Power Plant
121 Champion Way, Suite 300
Canonsburg, PA 15317

Facility ID: 0247030013
Permit Number: P0085253
County: Lorain

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 Chronicle Telegram. 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 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 Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

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 Ohio EPA DAPC, Northeast District Office at (330)963-1200.

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
Ohio EPA-NEDO

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

Draft Title V Permit Renewal

Avon Lake Power Plant

33570 Lake Road, , Avon Lake, OH 44012-0000

ID#: P0085253

Date of Action: 7/26/2016

Permit Desc: Renewal of Title V Permit for electric utility generating station..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Corey Kurjian, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200



Statement of Basis for Air Pollution Title V Permit

Facility ID:	0247030013
Facility Name:	Avon Lake Power Plant
Facility Description:	Electric Utility Generating Station
Facility Address:	33570 Lake Road, Avon Lake, OH 44012-0000
Permit #:	P0085253, Renewal
This facility is subject to Title V because it is major for: <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 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	

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
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.	No
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 document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	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 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)	N/A
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.	CAM is applicable to emissions units B012.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2	109		Submission of timely permit applications.
B.4	103		Acid Rain Permits and Compliance
B.6	25		In accordance with Ohio EPA Engineering Guide #64, the emission control action programs as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.
B.5		40 CFR Part 61	Subpart M, Asbestos renovation and demolition activities
B.7		40 CFR Part 63	Boiler MACT rule Subpart DDDDD applicability for emissions units B010, B012, B015, and B016
B.8		40 CFR Part 63	Utility MACT rule Subpart UUUUU applicability for emissions units B012
B.12		40 CFR	Compliance Assurance Monitoring (CAM) rule for emissions units B012



		Part 64	
--	--	---------	--

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
 Avon Lake Power Plant
 Permit Number: P0085253
 Facility ID: 0247030013

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
B010	The maximum annual heat input for this emissions unit shall not exceed 990,756 MMBtu, based upon a rolling, 12-month summation of the monthly heat input values.	31-05(D)		N	Y	Y	N	Y	Y	N	N	N	OR- limit maximum annual heat input (i.e., capacity factor restriction) to qualify as a coal-fired "limited use boiler" per 40 CFR Part 63, Subpart DDDDD M/R: monthly heart input records RP-quarterly deviation reports
	Particulate emissions (PE) shall not exceed 0.1 lb/mmBtu of actual heat input.	17-10(C)		N	N	Y	N	Y	Y	Y	N	N	M/R-Opacity Monitor Rp- quarterly reporting of opacity values in excess of the allowable opacity limitation ET- test by 2/28/2020.
	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.	17-07(A)(1)		N	N	Y	N	Y	Y	N	N	N	M/R-Opacity Monitor Rp- quarterly reporting of opacity values in excess of the allowable opacity limitation ET- opacity monitor & if required, Method 9
	Sulfur dioxide (SO2) emissions shall not exceed 4.65 lbs/mmBtu actual heat input.	18-53(B)(2)		N	N	Y	N	Y	Y	N	N	N	M/R-SO2 Monitor Rp- quarterly reporting of SO2 monitor values in excess of the allowable limitation ET- SO2 monitor & if required
			40 CFR Part 63, Subpart UUUUU	N	N	Y	N	Y	Y	N	N	N	Exempt per 40 CFR Part 63, Subpart DDDDD as a "limited-use boiler".
			40 CFR Part 63, Subpart	N	N	Y	N	Y	Y	Y	N	N	The limited-use boiler is subject to an initial tune-up and 5-year tune-up requirements. Each limited-use boiler identified above shall have a



Statement of Basis
 Avon Lake Power Plant
 Permit Number: P0085253
 Facility ID: 0247030013

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
			DDDDD										federally enforceable average annual capacity factor of no more than 10%.
B012	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.	17-07(A)		N	N	Y	N	Y	Y	N	N	N	M/R-Opacity Monitor Rp- quarterly reporting of opacity values in excess of the allowable opacity limitation ET- opacity monitor & if required Method 9
	Particulate emissions (PE) shall not exceed 0.1 lb/mmBtu of actual heat input.	17-10(C)		N	N	Y	N	Y	Y	N	N		M/R-Opacity Monitor & daily VE checks Rp- quarterly reporting of opacity values in excess of the allowable opacity limitation & Semiannual VE reports ET- If required, Methods 1 – 5
	Sulfur dioxide emissions shall not exceed 4.65 lbs/mmBtu actual heat input.	18-53(B)(2)		N	N	Y	N	Y	Y	N	N	N	M/R-SO2 Monitor, daily coal sampling Rp- quarterly reporting of SO2 monitor values in excess of the allowable limitation & monthly reporting on quality and quantity of coal burned ET- SO2 monitor & if required
	CAM Rule – affected sources for particulate emissions (PE), only.		40 CFR Part 64, Compliance Assurance Monitoring (CAM) Rule										The CAM Rule requires the permittee to submit a CAM Plan for PE for these emissions units. PE is the only pollutant for which the emissions units has >100 tpy PTE and uses a control device. 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.
	See 40 CFR 63.9991 and Table 2 for applicable limitations for existing coal-fired EGUs, constructed prior	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.



Statement of Basis
 Avon Lake Power Plant
 Permit Number: P0085253
 Facility ID: 0247030013

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	to 5/3/2011.												
B013	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.	17-07(A)		N	N	Y	N	Y	Y	N	N	N	M/R-VE daily VE checks Rp- Semiannual VE reporting ET- if required, Method 9
	Particulate emissions (PE) shall not exceed 0.040 lb/mmBtu of actual heat input.	17-11(B)(4)		N	N	Y	N	Y	Y	N	N	N	M/R-VE daily VE checks Rp- Semiannual VE reporting ET- if required, Methods 1-5
	Sulfur dioxide emissions shall not exceed 0.5 lbs/mmBtu actual heat input.	18-06(F)		N	N	Y	N	Y	Y	N	N	N	M/R- daily oil sampling Rp- deviation reports 45 days after the deviation occurs. Et- If required, Methods 1-4, 6.
F001	No visible emissions except for 6 minutes during any 60-minute observation period.	17-07(B)(7)(a)(ii) (Paved surfaces)		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 22 procedures.
	Reasonably available control measures that are sufficient to minimize or eliminate visible	17-08(B)(1) and (B)(2), (B)(8), and (B)(9)		N	N	Y	N	Y	Y	N	N	N	Basis – RACM treat paved and unpaved roadways with wet suppression and/or other suitable dust suppressants to ensure compliance. M/R – weekly inspections and logs. Rp – quarterly reports. ET – Compliance is demonstrated by inspections, record



Statement of Basis
 Avon Lake Power Plant
 Permit Number: P0085253
 Facility ID: 0247030013

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	PE of fugitive dust												keeping, reporting, and the use of control measures.
	No visible emissions except for 13 minutes during any 60-minute observation period.	17-07(B)(7)(a)(ii) (Unpaved surfaces)		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 22 procedures since the applicable compliance method under the OAC rules is Method 22, as specified in the testing terms.
F002	Visible particulate emissions shall not exceed 20% opacity as a 3-minute average during load-in or load-out of the coal storage pile.	17-07(B)(7)(b)		N	N	Y	N	Y	Y	N	N	N	M/R- weekly inspections Rp- quarterly reports Et- If required, Method 9
	Visible particulate emissions shall not exceed 20% opacity as a 3-minute average during operation of vehicles on top of the coal storage pile, excluding emissions from combustion of fuels in such vehicles (i.e. pile working).	17-07(B)(7)(c)		N	N	Y	N	Y	Y	N	N	N	M/R- weekly inspections Rp- quarterly reports Et- If required, Method 9
	No visible particulate	17-07(B)(7)(d)		N	N	Y	N	Y	Y	N	N	N	M/R- weekly inspections Rp- quarterly reports



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	emissions except for 13 minutes during any 60-minute observation period due to wind erosion from of the coal storage pile.												Et- If required, Method 22
	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust	17-08(B)(1) and (B)(6)		N	N	Y	N	Y	Y	N	N	N	M/R – weekly inspections and logs. Rp – quarterly reports. ET – Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.
P901	Visible particulate emissions shall not exceed 20% opacity as a 3-minute average	17-07(B)(7)(b)											M/R- weekly inspections Rp- quarterly reports Et- If required, Method 9
	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust	17-08(B) and (B)(6)		N	N	Y	N	Y	Y	N	N	N	M/R – weekly inspections and logs. Rp – quarterly reports. ET – Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.
B015 and B016	Particulate emissions (PE) shall not exceed 0.02 lb/mmBtu of actual heat input.	17-10(B)		N	N	Y	N	Y	Y	N	N	N	M/R-Opacity Monitor Rp- quarterly reporting of opacity values in excess of the allowable opacity limitation ET- if required, Methods 1 -5.
	Visible particulate emission limitations	17-07(A)		N	N	Y	N	Y	Y	N	N	N	M/R-Opacity Monitor Rp- quarterly reporting of opacity values in excess of the allowable opacity limitation



Statement of Basis
 Avon Lake Power Plant
 Permit Number: P0085253
 Facility ID: 0247030013

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	specified by this rule are less stringent than the visible particulate emission limitations specified in 40 CFR, Part 60, Subpart Db.												ET- opacity monitor & if required, Method 9
	The sulfur dioxide emission limitations specified by these rules are less stringent than the sulfur dioxide emission limitations established pursuant to OAC rule 3745-31-05(A)(3).	18-53(A)(2)		N	N	Y	N	Y	Y	N	N	N	M/R- oil sampling of each shipment Rp- deviation reports 45 days after the deviation occurs. Et- If required, Methods 1-4, 6.
	Carbon monoxide emissions shall not exceed 0.09 lb/mmBtu actual heat input, 19.75 lbs/hr and 86.53 tons/yr. Particulate emissions (PE) shall not exceed 4.39 lbs/hr and 19.23 tons/yr. Nitrogen oxides	31-05(A)(3) PTI No. 02-10862		N	N	Y	N	Y	Y	N	N	N	For PE and CO: Et- If required Methods 1 – 4 and 10 (for CO) and Methods 1-5 (for PE). For NOx: M/R- NOx Monitor & monthly records of heat inputs R- Quarterly reports Et- NOx Monitor & If required Methods 1 -4, 7. For SO2: M/R- oil sampling of each shipment Rp- deviation reports 45 days after the deviation occurs. Et- If required, Methods 1-4, 6.



Statement of Basis
 Avon Lake Power Plant
 Permit Number: P0085253
 Facility ID: 0247030013

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	<p>emissions shall not exceed 43.9 lbs/hr and 192.3 tons/yr.</p> <p>Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input, 105.0 lbs/hr and 460.0 tons/yr.</p> <p>The height of the stack serving this emissions unit shall be at least 400 feet above ground level.</p>												
	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.		40 CFR Part 60, Subpart Db, Section 60.43b	N	N	Y	N	Y	Y	N	N	N	M/R-Opacity Monitor Rp- quarterly reporting of opacity values in excess of the allowable opacity limitation ET- opacity monitor & if required Method 9
	Nitrogen oxides emissions shall not exceed 0.02 lb/mmBtu of actual heat input (expressed as nitrogen oxide).		40 CFR Part 60, Subpart Db, Section 60.44b	N	N	Y	N	Y	Y	N	N	N	M/R-NOx Monitor Rp- quarterly reporting of opacity values in excess of the allowable NOx limitation ET- if required Methods 1-4, 7



Statement of Basis
 Avon Lake Power Plant
 Permit Number: P0085253
 Facility ID: 0247030013

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	The sulfur dioxide emission limitations specified by these rules are less stringent than the sulfur dioxide emission limitations established pursuant to OAC rule 3745-31-05(A)(3).		40 CFR Part 60, Subpart Db, Section 60.42b(a)	N	N	Y	N	Y	Y	N	N	N	M/R- oil sampling of each shipment Rp- deviation reports 45 days after the deviation occurs. Et- If required, Methods 1-4, 6.
	One-time energy assessment. Boiler tune-ups.		40 CFR part 63, Subpart DDDDD	N	N	Y	N	Y	Y	N	N	N	The boilers are designed to only burn gas 1 fuels (subcategory) and therefore are not subject to the emission limits in Table 2 of the subpart or the operating limits in Table 4 to the subpart.



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Avon Lake Power Plant**

Facility ID:	0247030013
Permit Number:	P0085253
Permit Type:	Renewal
Issued:	7/26/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Avon Lake Power Plant

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans	7
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	9
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies.....	12
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	26
1. B010, Boiler #10	27
2. B012, Boiler #12	39
3. B013, Oil-fired Turbine	58
4. F001, Roads and Parking	62
5. F002, Coal Pile	66
6. P901, Coal Handling	72
7. Emissions Unit Group -Package Boilers: B015, B016	78



Draft Title V Permit
Avon Lake Power Plant
Permit Number: P0085253
Facility ID: 0247030013

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0247030013
Facility Description: Electric Utility Generating Station
Application Number(s): A0015880, A0053351, A0054498
Permit Number: P0085253
Permit Description: Renewal of Title V Permit for electric utility generating station.
Permit Type: Renewal
Issue Date: 7/26/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0085252

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

Avon Lake Power Plant
33570 Lake Road
Avon Lake, OH 44012-0000

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
Avon Lake Power Plant
Permit Number: P0085253
Facility ID: 0247030013
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

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

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

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



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

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

14. Permit Shield

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

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

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

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

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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

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

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

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

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

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

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

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

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

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



Draft Title V Permit
Avon Lake Power Plant
Permit Number: P0085253
Facility ID: 0247030013

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 Ohio EPA DAPC, Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Draft Title V Permit
Avon Lake Power Plant
Permit Number: P0085253
Facility ID: 0247030013
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

4. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The permittee shall ensure that any CAIR NO_x, SO₂, or NO_x 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)

3. 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_x Annual Trading Program and TR NO_x Ozone Season Trading Program.

<u>Unit ID:</u> B012: 6,040 mmBtu/hr boiler with activated carbon injection (ACI) and dry sorbent injection (DSI) systems, Unit 1
--

Parameter	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x 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 ₂	x				
NO _x					
Heat input					

- c) The above descriptions 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 97.630 through 97.635 (TR SO₂ 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 for each unit is available at the EPA's website at: <http://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 97.635 (TR SO₂ 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 97.630 through 97.634 (TR SO₂ Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 97.635 (TR SO₂ 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 97.630 through 97.634 (TR SO₂ 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 SO₂ 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 ₂ 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 (all of section 3):40 CFR Part 97)

- 4. 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 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 this rule are prohibited. The requirements of this rule will be specified in the Title V permit issued to this facility.

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

- 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 facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

(Authority for term: OAC Chapter 3745-25)

- 7. The following emissions unit contained in this permit are subject to 40 CFR Part 63, Subparts A and DDDDD, National Emission Standards for Hazardous Air Pollutants (NESHAP) Industrial, Commercial, and Institutional Boilers and Process Heaters: B010(when operating as a limited-use Auxiliary Boiler), 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]

- a) The terms in this permit identify the applicable requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) contained in 40 CFR Part 63, Subpart DDDDD. The requirements of this subpart apply to the facility's boilers and process heaters according to their applicable subcategory, as identified in 40 CFR 63.7499 and as defined in 40 CFR 63.7575. The terms of this permit restate the requirements of 40 CFR Part 63, Subpart DDDDD and are not intended to make these requirements more stringent or provide less flexibility than the existing federal requirements.

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

- b) Boilers designed to only burn gas 1 fuels (subcategory) are not subject to the emission limits in Table 2 of the subpart or the operating limits in Table 4 to the subpart. However, the boilers are subject to tune-up requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and the existing boilers must be included in the one-time energy assessment, performed in accordance with Table 3 #4 of the subpart.

[Authority for term: 40 CFR 63.7500(e) and 40 CFR 63.7540(a)(10) through (13)]

- c) Emissions unit B010 is identified as a limited-use boiler and not subject to the emission limits in Table 2 of the subpart, the operating limits in Table 4 of the subpart, or the energy assessment requirements in Table 3 of the subpart. However, the limited-use boiler(s) are subject to 5-year tune-up requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart.

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

- d) Each limited-use boiler shall have a federally enforceable average annual capacity factor of no more than 10%.

[Authority for term: 40 CFR 63.7500(c) and 40 CFR 63.7540(a)(10), (12), and (13)]

7. Any reference to the "Director" in this permit shall take the meaning of the applicable District Office or local air agency of the Division of Air Pollution Control (DAPC), unless otherwise specified in the terms. Unless other arrangements have been approved by the Director, notification of the initial certification and performance evaluations of a continuous monitoring system (CMS), scheduled performance testing, and all required reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
8. 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 (also known as the Utility MATS Rule): B012. 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)

9. This facility has operated two existing, coal-fired electric steam generating units (EGUs) (emissions units B010 and B012). The emissions units were both initially subject to a compliance deadline of April 16, 2015, in accordance with Section 40 CFR 63.9984(b).

On September 5, 2013, the Ohio EPA Director granted this facility a one-year MATS compliance extension following receipt of a written request from the applicant, per Section 63.6 of 40 CFR Part 63, Subpart A - General Provisions.

In accordance with the terms of the one-year compliance extension, the compliance deadline expired on April 16, 2016.

Per 40 CFR Part 63, Subpart UUUUU, any electric utility steam generating unit that has the capability of combusting more than 25 MW of coal or oil but did not fire coal or oil for more than 10.0 percent of the average annual heat input during any 3 calendar years or for more than 15.0 percent of the annual heat input during any calendar year is not subject to 40 CFR Part 63, Subpart UUUUU. Accordingly, a PTI Administrative Modification (P0120245) was issued on April 19, 2016 designating emissions unit B010 as a "limited use boiler", thereby exempting the emissions unit from 40 CFR Part 63, Subpart UUUUU.

The requested one-year compliance extension was to provide time for the applicant to construct a gas line to the facility and then install natural gas burners in emissions units B010 (Unit 7) and B012 (Unit 9). Due to delays in extending the natural gas line to the facility, the Avon Lake Generating Station has installed air pollution control equipment (Activated Carbon Injection and Dry Sorbent Injection Systems) on emissions unit B012 in an effort to comply with 40 CFR Part 63, Subpart UUUUU since it will retain the ability to burn coal as a bridge until the natural gas project is completed.

10. As part of the aforementioned one-year compliance extension, the applicant shall submit quarterly reports to Ohio EPA no later than 15 days after the end of the calendar quarter. The first submission shall begin after the quarter ending December 31 2013. Said reports shall be submitted to Christopher Beekman at Ohio EPA Central Office, Division of Air Pollution Control and a copy to Ed Fasko of the Northeast District Office. Information in the quarterly updates shall include, at a minimum, the project status of major construction milestones such as pipeline procurement, pipeline route development, pipeline permitting and Ohio Power Siting Board approval, erection of burner equipment and the status of final commissioning activities.

The requirement to submit said quarterly reports shall end upon achievement of the final report indicating MATS compliance has been achieved (the final report shall be submitted in the 3rd quarter of 2016).

[As a bridge until the natural gas project is completed, the Avon Lake Generating Station has installed additional control equipment for the purpose of MATS compliance while running on coal. Please note that failure to achieve MATS compliance will result in NRG being subject to enforcement action(s) by the Ohio EPA and the U.S. EPA]

11. On March 3, 2014, Ohio EPA received a request for an environmentally beneficial determination from NRG Energy. The proposed environmentally beneficial project is for the installation of natural gas-fired burners in B010 and B012.

Ohio Administrative Code paragraph 3745-31-01(QQQ)(1)(a)(vi) allows the director to exempt a project from the need to obtain an installation permit if the director determines that the project qualifies as an environmentally beneficial project.

The environmentally beneficial determination was approved contingent on the following conditions:

- a) Prior to beginning construction of the gas-fired burner modifications to Avon Lake boilers #10 and #12, NRG Energy shall submit a revised Title V application through Ohio EPA's eBusiness Center. This revised application shall include, at a minimum, the following information:
 - (1) A commitment to conduct U.S. EPA-approved emissions tests while burning natural gas only for Particulate Matter less than 2.5 micron in diameter (PM2.5), Nitrogen Dioxide (NO₂), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC) at a minimum. These tests shall all be completed within 180 days of start-up of each boiler on natural gas.
 - (2) A commitment to submit an Intent-to-test form within 30 days prior to beginning emissions testing that describes the emissions testing that will be done.

- b) Prior to burning coal at a rate greater than that allowed without additional controls under the MATS/Boiler MACT clean fuel exemption on or after April 16, 2016, NRG Energy shall do the following:
 - (1) Meet with Ohio EPA air pollution personnel to discuss the proposed control equipment and/or equipment modifications that will be needed in order to comply with MATS. At a minimum, discuss the need for any permit, the applicability of any rules including any newly applicable rules, the need for any air pollution computer modeling, and the need for any other supporting information.
 - (2) Determine, based on discussions with and guidance from Ohio EPA, if the installation of the control equipment and/or equipment modifications will require obtaining an installation permit.
 - (3) If it is determined that an installation permit is required, then apply for and obtain an installation permit and follow any applicable restrictions on construction found in Ohio Administrative Code rule 3745-31-33.
 - (4) Determine, based on discussions with and guidance from Ohio EPA, which type of Title V modification will be needed (off-permit, administrative permit amendment, minor permit modification or significant permit modification). See OAC chapter 3745-77. Follow any applicable requirements associated with the type of Title V modification.
 - (5) Submit a revised Title V modification application that takes into account any changes associated with the new control equipment and/or the equipment modifications.
 - (6) A commitment to conduct U.S. EPA-approved emissions tests while burning coal only for Particulate Matter less than 2.5 microns in diameter (PM2.5), Nitrogen Oxides (NO_x), Carbon Monoxide (CO), Volatile Organic Compounds (VOC), Hazardous Air Pollutants (HAPS) at a minimum. These tests shall all be completed within 180 days of start-up of each boiler after controls are installed and operating.

A commitment to submit an Intent-to-test form within 30 days prior to beginning emissions testing that describes the emissions testing that will be done.

12. The NEDO has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee on October 22, 2013 pursuant to 40 CFR Part 64, for emissions unit B012. The permittee shall comply with the provisions of the plan (as specified in Part C - Terms and Conditions for Emissions Units) during operation at or above minimal sustainable load of the aforementioned emissions unit.

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 unit B012 becomes subject to this rule.

(Authority for term: 40 CFR Part 64)

- C. The following abbreviations are used throughout this permit:

ESP = Electrostatic precipitator

FGD = Flue gas desulfurization

NO_x = Nitrogen Oxides

CO = Carbon Monoxide

CO₂ = Carbon Dioxide

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" [for Method 5 testing under 40 CFR UUUUU front half temperature shall be 160° ± 14 °C (320° ± 25 °F)]

PM₁₀ = 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_{2.5} = 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

SO₂ = Sulfur dioxide

HAP = Hazardous Air Pollutant

GHG = Greenhouse gas

TPY = Ton(s) per year

MMBtu = million British thermal units



Draft Title V Permit
Avon Lake Power Plant
Permit Number: P0085253
Facility ID: 0247030013

Effective Date: To be entered upon final issuance

TBtu = trillion British thermal units

GWh = gigawatt hour

MW = megawatt

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code

ORC = Ohio Revised Code



Draft Title V Permit
Avon Lake Power Plant
Permit Number: P0085253
Facility ID: 0247030013
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. B010, Boiler #10

Operations, Property and/or Equipment Description:

Coal- and natural gas-fired boiler - 1131 MMBtu/hr

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Capacity factor restriction to qualify as a coal-fired "limited use boiler" per 40 CFR Part 63, Subpart DDDDD)	See c)(1).
b.	OAC rule 3745-17-10(C)	Particulate emissions (PE) shall not exceed 0.1 lb/mmBtu of actual heat input.
c.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-18-53(B)(2)	Sulfur dioxide (SO ₂) emissions shall not exceed 4.65 lbs/mmBtu actual heat input.
e.	40 CFR Part 63, Subpart UUUUU - National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units	See b)(2)f. & h.
f.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 – 63.7575) [In accordance with 40 CFR 63.7500(c) this emissions unit is a limited use boiler subject to the tune-up requirements specified in this section.]	Tune-up requirements specified in Table 3 (40 CFR 63.7540). See b)(2)f. & g.
g.	40 CFR 63.1 – 63.16 (40 CFR 63.7565)	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		which parts of the General Provisions in 40 CFR 63.1 – 63.16 apply.

(2) Additional Terms and Conditions

- a. This emissions unit is not subject to the requirements of 40 CFR Part 60, Subpart D (Standards of Performance for Fossil Fuel Fired Generators) or 40 CFR Part 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units).
- 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. 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.
- c. The continuous opacity monitoring system consists of all the equipment used to acquire data and record opacity.
- d. The permittee shall maintain a written quality assurance/quality control plan for the continuous SO₂ monitoring system, designed to ensure continuous valid and representative readings of SO₂ 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 SO₂ 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 SO₂ 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.

- e. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

- f. The following conditions apply to emissions unit B010 only when the emissions unit is operating as an industrial boiler subject to 40 CFR Part 63, subpart DDDDD. In addition, those conditions do not apply to the emissions unit during periods of operation as an Electric Generating Unit (EGU). Any electric utility steam generating unit that has the capability of combusting more than 25 MW of coal or oil but did not fire coal or oil for more than 10.0 percent of the average annual heat input during any 3 calendar years or for more than 15.0 percent of the annual heat input during any calendar year is not subject to 40 CFR Part 63, Subpart UUUUU.
 - i) This emissions unit is identified as a limited-use boiler and is not subject to the emission limits in Table 2 of the subpart, the operating limits in Table 4 of the subpart, or the energy assessment requirements in Table 3 of the subpart.
 - ii) The limited-use boiler is subject to 5-year tune-up requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart: Each limited-use boiler identified above shall have a federally enforceable average annual capacity factor of no more than 10%.
 - iii) The permittee shall comply with the tune-up requirements specified in 40 CFR Part 63.7540(a)(10)(i) through (vi).

- g. An initial tune-up must be completed for emissions unit B010 no later than the compliance date specified in 40 CFR 63.7495, except as specified in paragraph (j) of 40 CFR 63.7510 section. Following the initial compliance date, tune-ups must be conducted for each boiler within the applicable 5-year schedule as specified in 40 CFR 63.7500(a)-(c), 40 CFR 63.7540(a)(10) through (13), and Table 3 to the subpart, unless alternative work practice standards are approved pursuant to 40 CFR 63.6(g). Each subsequent tune-up must occur no more than 61 months after the previous tune-up. If the boiler is not in operation at the time of its scheduled tune-up, the permittee is not required to perform the tune-up at that time but must complete the tune-up within 30 days after the re-start of the boiler. Units that produce electricity for sale may delay the inspection until the first outage, but may not exceed 36 months from the previous inspection. The frequency of tune-ups shall be based on the frequency identified in Table 3 to the subpart.

Each tune-up conducted to demonstrate compliance with the requirements of Part 63 Subpart DDDDD shall include the following elements as applicable:

- i) inspection of the burner(s) (and requirement to clean or replace any necessary components);

- ii) inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications if applicable;
 - iii) inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;
 - iv) optimize total emissions of CO, in correlation with any applicable NO_x standards, consistent with the manufacturer's specification if applicable;
 - v) measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be made using a portable CO analyzer);
 - vi) maintain records of the tune-up, inspection, and any corrective actions taken; and
 - vii) where more than one type of fuel is used, records of the type and amount of each fuel type burned over the 12 months prior to the tune-up.
- h. On September 5, 2013, the permittee received a Mercury and Air Toxics Standards (MATS) Extension which extended the compliance date of 40 CFR Part 63, Subpart UUUUU to April 16, 2016. Since being subject to 40 CFR Part 63, Subpart UUUUU excludes one from being subject to 40 CFR Part 63, Subpart DDDDD, the permittee shall comply with the requirements and limits of 40 CFR Part 63, Subpart DDDDD for emissions unit B010 and shall be in compliance with this NESHAP no later than April 16, 2016, at the conclusion of the compliance extension for 40 CFR Part 63, Subpart UUUUU.
- i. The above applicable requirements in C.1.b)(1) and C.1.b)(2) are applicable when operating the emissions unit as an auxiliary boiler.
- c) **Operational Restrictions**
- (1) When operating emissions unit B010 as an auxiliary boiler:
- a. The maximum annual heat input for this emissions unit shall not exceed 990,756 MMBtu, based upon a rolling, 12-month summation of the monthly heat input values. The permittee has sufficient records to demonstrate compliance with the annual heat input limitation upon permit issuance in order to qualify as a "limited-use boiler" per 40 CFR Part 63, Subpart DDDDD.
- [Authority for term: permit no. P0120245 and OAC rule 3745-77-07(C)(1)]
- b. The permittee shall perform all maintenance activities as specified per the manufacturer's recommendations. To the extent practicable, the permittee shall



maintain and operate the boiler, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.

[Authority for term: permit no. P0120245 and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of heat input utilizing one of the following procedures:

a. Coal burn derived heat input:

- i) the fuel usage of coal for emissions unit B010, in pounds;
- ii) the heat input rate for emissions unit B010, in mmBtu (calculated by multiplying d)(1)a by the coal heating value); and
- iii) the rolling, 12-month summation of the monthly heat input rate, in mmBtu.

b. CEMS heat input:

- i) Heat input from a certified CEMS will be used for the 12-month summation of the monthly heat input rate.

[Authority for term: Permit no. P0120245 and OAC rule 3745-77-07(C)(1)]

(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.

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

[Authority for term: Permit no. P0120245, OAC rule 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

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

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

Effective Date: To be entered upon final issuance

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

[Authority for term: Permit no. P0120245, OAC rule 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

- (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 SO₂ monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6; 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: Permit no. P0120245, OAC rule 3745-77-07(C)(1), 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 SO₂ 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 SO₂ monitoring system including, but not limited to:

- a. emissions of SO₂ in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of SO₂ in pounds per hour and in units of the applicable standard(s) in the appropriate averaging period;
- 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, continuous SO₂ monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous SO₂ monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous SO₂ 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: Permit no. P0120245, OAC rule 3745-77-07(C)(1), 40 CFR 60.13; 40 CFR Part 60, Appendices B & F; and 40 CFR Part 75]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month heat input limitation for emissions unit B010 when operating the emissions unit as an auxiliary boiler.

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

[Authority for term: Permit no. P0120245 and OAC rule 3745-77-07(C)(1)]

- (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) the total operating time (hours) of the emissions unit;
 - vi) the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii) the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;
 - viii) the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
 - ix) the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

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 of whether there is an exceedance of the opacity limit

[Authority for term: 40 CFR 60.7]

- (3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO₂ 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 SO₂ 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 SO₂ 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 SO₂ emissions for the calendar quarter (tons);
 - vi) the total operating time (hours) of the emissions unit;
 - vii) the total operating time of the continuous SO₂ 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 SO₂ 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 SO₂ monitoring system, emissions unit, and/or control equipment;
 - xii) the date, time, and duration of any downtime** of the continuous SO₂ monitoring system and/or control equipment 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 3745-31-05(A)(3) 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 of whether there is an exceedance of any applicable limit

[Authority for term: Permit no. P0120245, OAC rule 3745-77-07(C)(1), 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: 40 CFR Part 75]

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

Ongoing compliance with the opacity limitation contained in this permit, 40 CFR Part 60, 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.

If required, compliance with visible PE limitation above shall be demonstrated in accordance with Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

PE shall not exceed 0.1 lb/mmBtu of actual heat input.



Applicable Compliance Method:

Compliance with the PE limitation above shall be demonstrated based on the results of stack testing as required in f)(2).

c. Emission Limitation:

SO₂ emissions shall not exceed 4.65 lbs/mmBtu actual heat input

Applicable Compliance Method:

Ongoing compliance with the SO₂ emission limitations 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.

If required, compliance with the SO₂ emission limitation above shall be demonstrated in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

[Authority for term: Permit no. P0120245, OAC rule 3745-77-07(C)(1), 40 CFR 60.13; 40 CFR Part 60, Appendices B & F; and 40 CFR Part 75]

(2) As long as emissions unit B010 is designated as a limited-use boiler per 40 CFR Part 63, Subpart DDDDD, the permittee shall conduct, or have conducted, particulate emission testing to demonstrate compliance with the allowable particulate emission rate in section b)(1)b above in accordance with the following requirements:

- a. The testing of emissions unit B010 as a limited-use boiler shall be conducted on 5 year intervals with the next required test to be performed no later than February 28, 2020.
- b. Compliance with the allowable mass emission rate for particulate emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).
- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.
- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).



- e. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of 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.
- f. 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

[Authority for term: Permit no. P0120245, OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9)]

- g) Miscellaneous Requirements
 - (1) None.

2. B012, Boiler #12

Operations, Property and/or Equipment Description:

Coal-fired and natural gas-fired boiler No. 12/Unit 9 for steam-electric generation – 6,040 mmBtu/hr with activated carbon injection (ACI) and dry sorbent injection (DSI) systems.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10(C)	PE shall not exceed 0.1 lb/mmBtu of actual heat input.
c.	OAC rule 3745-18-53(B)(2)	SO ₂ emissions shall not exceed 4.65 lbs/mmBtu actual heat input.
d.	40 CFR Part 64 [40 CFR 64.1-10] <i>Compliance Assurance Monitoring (CAM)</i>	See b)(2)e., b)(2)f., b)(2)g., d)(5), d)(6), e)(3), and e)(4). 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.
e.	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.
f.	40 CFR Part 63, Subpart UUUUU [40 CFR 63.9980-10042] National Emission Standards for Hazardous Air Pollutants: Coal- and	The permittee shall comply with the following emission limitations as specified in 40 CFR 63.9991 and Table 2: Mercury (Hg) 1.2E0 lb/TBtu or 1.3E-2

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>Oil-fired Electric Utility Steam Generating Units</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>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 (SO₂) 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></p> <p>2) 5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh of Total non-Hg HAP metals; <u>OR</u></p> <p>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)(1).</p>

(2) Additional Terms and Conditions

- a. This emissions unit is not subject to the requirements of 40 CFR Part 60, Subpart D (Standards of Performance for Fossil Fuel Fired Generators) or 40 CFR Part 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units).
- 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. 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.
- c. The continuous opacity monitoring system consists of all the equipment used to acquire data and record opacity.
- d. The permittee shall maintain a written quality assurance/quality control plan for the continuous SO₂ monitoring system, designed to ensure continuous valid and representative readings of SO₂ 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 SO₂ 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 SO₂ 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.

- e. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

- f. In accordance with 40 CFR 64.2(a), this emissions unit is a pollutant specific emissions unit located at a major source required to obtain a Title V permit, is subject to a particulate emission standard, uses a control device to achieve compliance with the emission standard, and has potential pre-control device particulate emissions greater than 100 tons per year.
- g. 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.

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, 63.10000(a), Tables 3 and 4	Work practice standards and operating limits
63.10000(b)	General duty to minimize emissions
63.10001	Malfunctions
63.10005(j) and Table 3	Startup and shutdown requirements
63.10021(e)	Periodic tune-up requirements

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

- (2) The emissions from the silos of the pollution control equipment (ACI and DSI systems) for this emissions unit shall be vented to the bin vent filters at all times while the emissions unit is in operation.

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

- a. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

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

- (3) The emissions unit and its associated air pollution control system(s) shall be maintained in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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

d) Monitoring and/or Recordkeeping Requirements

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

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

- (3) 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 SO₂ monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6; 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 60.13; 40 CFR Part 60, Appendix B; and 40 CFR Part 75]

- (4) The permittee shall operate and maintain equipment to continuously monitor and record SO₂ 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 SO₂ monitoring system including, but not limited to:

- a. emissions of SO₂ in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of SO₂ in pounds per hour and in units of the applicable standard(s) in the appropriate averaging period;
- 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, continuous SO₂ monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous SO₂ monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous SO₂ 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 60.13; 40 CFR Part 60, Appendices B & F; and 40 CFR Part 75]

- (5) The permittee shall collect daily composite samples of the coal burned in this emissions unit. A sufficient number of individual samples shall be collected so that each composite sample is representative of the average quality of coal burned in this emissions unit during each calendar day. The coal sampling shall be performed in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal.

Each daily composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

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

- (6) The permittee shall maintain daily records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, and heat content.

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

- (7) The CAM plan for this emissions unit has been developed for PE. The CAM performance indicator for visible particulate emissions is the opacity of the visible emissions from the common stack as measured and recorded by the certified continuous opacity monitoring (COM) system. The visible particulate emissions indicator range is each three-hour block average at or above minimal sustainable load with an opacity value greater than 15%. The three-hour block average opacity shall be based on the one-minute values recorded in d)(2)a. When the opacity value over the averaging period of the indicator range is greater than 15%, corrective action (including, but not limited to, an evaluation of the emissions unit and electrostatic precipitator) shall be assessed and implemented as appropriate.

Upon detecting an excursion of the visible particulate emission indicator range listed above, 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 or exceedance (other than those caused by excused startup or shutdown conditions). 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), 40 CFR Part 64.7, and 40 CFR Part 64.9)

- (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) and 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 PM monitoring requirements specified in 40 CFR section 63.10010 may satisfy the monitoring requirements of 40 CFR Part 64 specified in d)(6), if the permittee chooses to comply with the PM emission 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 PM emission 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
63.10010(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
63.10023	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) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the bin vent filters for the ACI and DSI systems when the controlled emissions unit(s) is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the bin vent filters on daily 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. The acceptable pressure drop shall be based upon the manufacturer's specifications.

Whenever the monitored value for the pressure drop deviates from the limit or range specified by the manufacturer, 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.

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

- (14) The bin vent filters shall be equipped with alarms indicating when the pressure drop is outside of the manufacturer's recommended differential pressure range, thus prompting a filter change and/or repair of the controls.

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

- (15) 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 stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the check until the incident has ended. The observer may indicate that the visible emissions 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.

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

- (16) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(13) and d)(15), the permittee may reduce the visual observations from daily readings to weekly readings if the following conditions are met:

- a. for 1 full quarter the facility's daily visual observations indicate no abnormal visible emissions; and
- b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(15), on a weekly basis.

The permittee shall revert to daily readings if any abnormal visible emissions are observed. The daily readings shall continue for one full quarter. If abnormal visible emissions are observed during this time, the permittee shall continue daily readings until

such time that no abnormal visible emissions have been observed for a period of three consecutive months.

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) the total operating time (hours) of the emissions unit;
 - vi) the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii) the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;
 - viii) the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
 - ix) the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

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 of whether there is an exceedance of the opacity limit

[Authority for term: 40 CFR 60.7]

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO₂ 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 SO₂ 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 SO₂ 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 SO₂ emissions for the calendar quarter (tons);
 - vi) the total operating time (hours) of the emissions unit;
 - vii) the total operating time of the continuous SO₂ 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 SO₂ 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 SO₂ monitoring system, emissions unit, and/or control equipment;
- xii) the date, time, and duration of any downtime** of the continuous SO₂ monitoring system and/or control equipment 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 3745-31-05(A)(3) 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 of whether there is an exceedance of any applicable limit

[Authority for term: 40 CFR 60.7 and 40 CFR Part 75]

- (3) 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)

- (4) The permittee shall submit monthly reports on the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each day during the calendar quarter:
 - a. the total quantity of coal burned (tons);
 - b. the average ash content (percent) of the coal burned;
 - c. the average sulfur content (percent) of the coal burned;
 - d. the average heat content (Btu/pound) of the coal burned; and

- e. the calculated, average potential (uncontrolled) sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) for the coal burned.

These monthly reports shall be submitted no later than 45 days after the end of each calendar month.

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

- (5) The permittee shall submit quarterly reports that document the following for each day in the calendar quarter:
 - a. the 30 boiler operating-day average SO₂ emission rate.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the information required by 40 CFR Part 60.49Da including 60.51Da(b) and 60.51Da(c). The quarterly report may satisfy the semi-annual reporting requirements of 60.51Da(j) if all information required under 60.51Da is included.

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

- (6) If the results of CAM monitoring or record keeping data indicate that the particulate emission limitations may have been exceeded when burning coal, the permittee shall submit the results of that data, and document any corrective action taken to restore operation of the emissions unit, or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

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

- (7) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the reporting requirements specified in 40 CFR section 63.10031 may satisfy the reporting requirements of 40 CFR Part 64 specified in e)(1), if the permittee chooses to comply with the PM emission 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 PM emission 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]

- (8) 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)

- (9) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each period of time (start time and date, and end time and date) when the pressure drop across the bin vent filters was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the bin vent filters;
 - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" or "b" 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" or "b" 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.

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

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

- (10) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;



- b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

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

- (11) These reports shall be submitted to the Director Ohio EPA's Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

Applicable Compliance Method:

Ongoing compliance with the 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 PE 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), 40 CFR 60.13, and 40 CFR Part 60, Appendix B)

- b. 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 (SO₂) 2.0E-1 lb/MMBtu or 1.5E0 lb/MWh.

Comply with one of the following limits:



Effective Date: To be entered upon final issuance

- 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;
 - 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)

c. Emission Limitation:

PE shall not exceed 0.1 lb/mmBtu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-17-11(B)(4)]

d. Emission Limitations:

SO₂ emissions shall not exceed 4.65 lbs/mmBtu actual heat input.



Applicable Compliance Method:

Ongoing compliance with the above SO₂ emission limitation contained in this permit, 40 CFR Parts 60 and 75, and any other applicable standard 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.

If required, US EPA Methods 1 – 4 and Method 6 or Method 6C, as specified in 40 CFR Part 60, Appendix A, shall be used to determine compliance with the SO₂ emission limitation.

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

- (2) 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
63.10021(a) and (d)	Continuous compliance demonstration requirements

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

- g) Miscellaneous Requirements

- (1) None.

3. B013, Oil-fired Turbine

Operations, Property and/or Equipment Description:

Oil-fired combustion turbine for electric generation - 468.9 mmBtu/hr

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(4)	PE shall not exceed 0.040 lb/mmBtu of actual heat input.
c.	OAC rule 3745-18-06(F)	SO ₂ emissions shall not exceed 0.5 lbs/mmBtu actual heat input.

(2) Additional Terms and Conditions

a. Emissions units B001 and B002 are not currently subject to the requirements specified in 40 CFR Part 60, Subpart GG – Standards of Performance for Stationary Gas Turbines. Emissions units B001 and B002 are exempt from the requirements of 40 CFR Part 60, Subpart GG because B001 and B002 were installed in 1973 prior to the applicability date of October 3, 1977 specified in 40 CFR 60.330(b).

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-18-53 and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall burn only distillate oils in this emissions unit.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. Alternative 1:

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

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

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

[Authority for term: OAC rule 3745-77-07(C)(1). OAC rules 3745-18-04(E)(3) and 3745-18-04(I)]

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

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

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated SO₂ emission rates from d)(1) above. The notification shall be submitted to the Director (Ohio EPA, Northeast District Office) within 45 days after the deviation occurs.

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

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

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

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the allowable SO₂ emission limitation above shall be demonstrated by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation.

Sulfur dioxide emissions from liquid fuel samples shall be calculated as follows:

$$ER = [(1 \times 10^6) / H] \times D \times S \times 1.974$$

where:

ER = the emission rate in pounds of sulfur dioxide per MMBtu;

H = the heat content of the liquid fuel in Btu per gallon;

D = the density of the liquid fuel in pounds per gallon; and

S = the decimal fraction of sulfur in the liquid fuel.

[OAC rule 3745-18-04(F)(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 rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

b. Emission Limitation:

PE shall not exceed 0.040 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the PE limitation above may be based upon an emission factor of 0.0043 lb/mmBtu as established in the US EPA reference document AP-42, Fifth Ed., 'Compilation of Emission Factors', Section 3.1, Table 3.1-2a (4/00).

If required, the permittee shall demonstrate compliance with the PE limitation above through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-17-11(B)(4)]

c. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)(a)]

g) Miscellaneous Requirements

- (1) None.

4. F001, Roads and Parking

Operations, Property and/or Equipment Description:

Paved/unpaved roads 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) (Paved surfaces)	No visible emissions, except for 6 minutes during any 60-minute observation period.
b.	OAC rule 3745-17-08(B)(1) and (B)(2)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (see (2)a. through (2)e. below).
d.	OAC rule 3745-17-07(B)(7)(a)(ii) (Unpaved surfaces)	No visible emissions, except for 13 minutes during any 60-minute observation period.
e.	OAC rule 3745-17-08(B)(1), (B)(8) and (B)(9)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (see (2)a. through (2)e. below).

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of chemical stabilization/dust suppressants and/or 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.

b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of



Effective Date: To be entered upon final issuance

this permit. Implementation of the control measures shall not be necessary for paved 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. 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.
- d. 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.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.
- f. Any unpaved roadway or parking area, which during the terms of this permit is paved or takes on the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measures specified above or paved surfaces. Any unpaved roadway or parking area, that takes on the characteristics of a paved surface due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

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>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
---	-------------------------------------

all roads and parking areas	weekly
-----------------------------	--------

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

- (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, except if the next required inspection is within one week.

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

(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 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)]

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.

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

(2) The quarterly deviation reports shall be submitted by January 30, April 30, July 30, and October 30 of each year.

[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:

No visible PE from paved roadways and parking areas, except for a period of time not to exceed 6 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation 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"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

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

b. Emission Limitation:

No visible PE from unpaved roadways and parking areas, except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation 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"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

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

g) Miscellaneous Requirements

(1) None.

5. F002, Coal Pile

Operations, Property and/or Equipment Description:

Coal storage pile

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 shall not exceed 20% opacity, as a 3-minute average during load-in or load-out of the coal storage pile.
b.	OAC rule 3745-17-08(B)(1) and (B)(6)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (see (2)a. through (2)e. below).
c.	OAC rule 3745-17-07(B)(7)(c)	Visible particulate emissions shall not exceed 20% opacity, as a 3-minute average during operation of vehicles on top of the coal storage pile, excluding emissions from combustion of fuels in such vehicles (i.e. pile working).
d.	OAC rule 3745-17-07(B)(7)(d)	No visible particulate emissions except for 13 minutes during any 60-minute observation period due to wind erosion from of the coal storage pile.

(2) Additional Terms and Conditions

a. The coal storage pile that is covered by this permit and subject to the requirements of OAC rules 3745-17-07 and OAC rule 3745-17-08:

Plant coal storage pile, located on the south side of Lake Road.

b. The permittee shall employ reasonably available control measures on all coal load-in and load-out operations associated with the coal storage piles for the

purpose of ensuring compliance with the above mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to use enclosures, telescopic chutes, and precautionary practices for the load-in operations and to use a reclaim system and under pile gravity feed for the coal load-out operations to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- c. The above-mentioned control measures shall be employed for each coal 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 measures are necessary to ensure compliance with the above mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.
- d. The permittee shall employ reasonably available control measures on all pile working operations associated with the coal 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 treat each pile working operation with water and/or other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ reasonably available control measures for wind erosion from pile surfaces associated with the coal 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 use precautionary operating practices for the pile working operations to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The above-mentioned control measures shall be employed for each pile working operation and 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 measures are necessary to ensure compliance with the above mentioned applicable requirements. Implementation of the control measures shall not be necessary for a coal storage pile that is covered with snow and/or ice if precipitation has occurred that is sufficient for the day to ensure compliance with the above mentioned applicable requirements.
- g. Implementation of the above mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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 coal load-in operation in accordance with the following frequencies:

<u>coal storage pile identification:</u>	<u>minimum inspection frequency</u>
--	-------------------------------------

plant coal storage pile	weekly, when in operation
-------------------------	---------------------------

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

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

<u>coal storage pile identification:</u>	<u>minimum inspection frequency</u>
--	-------------------------------------

plant coal storage pile	weekly, when in operation
-------------------------	---------------------------

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

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

<u>coal storage pile identification:</u>	<u>minimum inspection frequency</u>
--	-------------------------------------

plant coal storage pile	weekly, when in operation
-------------------------	---------------------------

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

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

<u>coal storage pile identification:</u>	<u>minimum inspection frequency</u>
--	-------------------------------------

plant coal storage pile	weekly, when in operation
-------------------------	---------------------------

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

- (5) No inspection shall be necessary for wind erosion from the surface of a 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 mentioned events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is with one week.

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

- (6) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for coal load-in or coal load-out of a storage pile, pile

working operations, and wind erosion from the surface of a coal storage pile. The inspections shall be performed during representative, normal storage pile operating conditions. These routine inspections do not require a Method 9 certified reader.

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

- (7) 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)(7) shall be kept separately for the coal load-in operations, the coal load-out operations, the coal pile working operations and the coal pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each quarter.

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

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.

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

- (2) The quarterly deviation reports shall be submitted by January 30, April 30, July 30, and October 30 of each year.

[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 shall not exceed 20% opacity, as a 3-minute average for coal load-in or load-out of the coal storage pile.

Applicable Compliance Method:

If required, compliance with the visible PE 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"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) through (B)(4)(b) of OAC rule 3745-17-03.

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

b. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 3-minute average during operation of vehicles on top of the coal storage pile, excluding emissions from combustion of fuels in such vehicles (i.e. pile working).

Applicable Compliance Method:

If required, compliance with the visible PE 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"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) through (B)(4)(b) of OAC rule 3745-17-03.

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

c. Emission Limitation:

No visible particulate emissions, except for 13 minutes during any 60-minute observation period due to wind erosion from of the coal storage pile.

Applicable Compliance Method:

If required, compliance with the visible PE 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"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) through (B)(4)(b) of OAC rule 3745-17-03.

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



Draft Title V Permit
Avon Lake Power Plant
Permit Number: P0085253
Facility ID: 0247030013

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) None.

6. P901, Coal Handling

Operations, Property and/or Equipment Description:

Coal unloading and conveying 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 3745-17-07(B)(7)(b)	Visible particulate emissions shall not exceed 20% opacity, as a 3-minute average.
b.	OAC rule 3745-17-08(B) and (B)(6)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (see (2)a. through (2)e. below).

(2) Additional Terms and Conditions

a. The coal unloading stations for barges, railcars or trucks that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Railcar Dumper House

Truck Dumping

'B' Dumper House

b. The coal conveyors that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

'AE' Belt (reclaim hopper conveyor)

'AF' Belt (dumper house conveyor)

'AG' Belt ('AE' Belt to transfer tower)



'AK' Belt (transfer tower to crusher house)

Stacker Conveyor

'AN' Belt (crusher house to transfer tower point of 'AP' and 'AR' Belts)

'AP' Belt ("AN" Belt to Unit #9 Bunker conveyor)

'AR' Belt ("AN" Belt to Units #6 and #7 Bunkers conveyor)

Units #6 and #7 Conveyor

'A' Belt ('B' Dumper House to 'B' Belt)

'B' Belt ('A' Belt transfer point)

'E' Belt (transfer point to Units #6 and #7 Bunkers)

- c. The coal handling operations that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Dumper House

Crusher House

- d. The coal transfer points that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Dumper House (railcar dumper with 'AF' Belt)

Crusher House ('AK' and 'AN' Belts)

Transfer Tower ('AG' and stacker belts to 'AK' Belt)

Southeast Junction Tower ('P' Belt to 'Q' Belt)

'AE' Belt to the 'AG' Belt

'AN' Belt to 'AP' and 'AR' Belts

'AP' Belt to Unit #9 Bunker conveyor

'AR' Belt to Units #6 and #7 Bunker conveyor

'B' Dumper House to 'A' Belt

'B' Belt to 'E' Belt

'E' Belt to Units #6 and #7 Bunker conveyor

- e. The permittee shall employ reasonably available control measures on all coal unloading stations for barges, railcars and/or trucks, coal conveyors, coal

handling operations and coal transfer points for the purpose of ensuring compliance with the above mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to use enclosures to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- f. For each coal unloading station, coal conveyor, coal handling operation and coal transfer point that is not adequately enclosed, such coal unloading station, coal conveyor, coal handling operation and coal transfer point shall be treated with water and/or suitable dust suppression chemicals if the permittee determines, as a result of the inspections conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of any coal unloading station, coal conveyor, coal handling operation and coal transfer point until further observation confirms that use of the control measures is unnecessary.
- g. Implementation of the above mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

[Authority for term: OAC rule 3745-17-08(B) and (B)(6)]

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, for coal unloading stations that are not adequately enclosed, the permittee shall perform inspections of such coal unloading stations in accordance with the following frequencies:

coal unloading station identification:

railcar rotary dumper house

truck dumping

'B' dumper house

minimum inspection frequency:

weekly when in operation

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

- (2) Except as otherwise provided in this section, for coal conveyors that are not adequately enclosed, the permittee shall perform inspections of such coal conveyors in accordance with the following frequencies:

coal conveyor identification:

'AE' Belt

'AF' Belt

'AG' Belt

'AK' Belt

Stacker Conveyor

'AN' Belt

'AP' Belt

'AR' Belt

Units #6 and #7 Conveyor

'A' Belt

'B' Belt

'E' Belt

minimum inspection frequency:

weekly when in operation

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

- (3) Except as otherwise provided in this section, for coal handling operations that are not adequately enclosed, the permittee shall perform inspections of such coal conveyors in accordance with the following frequencies:

coal handling operation identification:

Dumper House

Crusher House

minimum inspection frequency:

weekly when in operation

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

- (4) Except as otherwise provided in this section, for coal transfer points that are not adequately enclosed, the permittee shall perform inspections of such coal conveyors in accordance with the following frequencies:

coal transfer point identification:

- Dumper House (railcar dumper with 'AF' belt)
- Crusher House ('AK' and 'AN' belts)
- Transfer tower ('AG' and stacker belts to 'AK' belt)
- Southeast Junction Tower ('P' belt to 'Q' belt)
- 'AE' Belt to the 'AG' Belt
- 'AP' Belts to Unit #9 Bunker Conveyor
- 'AR' Belt to Units #6 and #7 Bunker Conveyor
- 'B' Dumper House to 'A' Belt
- 'B' Belt to 'E' Belt
- 'E' Belt to Units #6 and #7 Bunker Conveyor

minimum inspection frequency:

weekly when in operation

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

- (5) The above-mentioned inspections shall be performed during representative, normal conditions.

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

- (6) 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 in d)(6) shall be kept separately for the coal unloading stations, the coal conveyors, the coal handling operations and 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)]

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.

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

- (2) 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)]

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 shall not exceed 20% opacity, as a 3-minute average for coal load-in or load-out of the coal storage pile.

Applicable Compliance Method:

If required, compliance with the visible PE 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"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) through (B)(3)(b) of OAC rule 3745-17-03.

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

g) Miscellaneous Requirements

- (1) None.

7. Emissions Unit Group -Package Boilers: B015, B016

EU ID	Operations, Property and/or Equipment Description
B015	Nebraska Company Package Boiler - 219.5 mmBtu/hr max (when firing natural gas) or 210 mmBtu/hr (when firing no. 2 fuel oil) heat input rating.
B016	Nebraska Company Package Boiler - 219.5 mmBtu/hr max (when firing natural gas) or 210 mmBtu/hr (when firing no. 2 fuel oil) heat input rating.

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.	40 CFR Part 60, Subpart Db	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity. (section 60.43b) NOx emissions shall not exceed 0.2 lb/mmBtu of actual heat input (expressed as nitrogen oxide). (section 60.44b) The SO ₂ emission limitation specified by this rule [section 60.42b(a)] is less stringent than the SO ₂ emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
b.	OAC rule 3745-17-10(B)	PE shall not exceed 0.02 lb/mmBtu of actual heat input.
c.	OAC rule 3745-31-05(A)(3) PTI No. 02-10862	CO emissions shall not exceed 0.09 lb/mmBtu actual heat input, 19.75 lbs/hr and 86.53 tons/yr. PE shall not exceed 4.39 lbs/hr and 19.23 tons/yr.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>NO_x emissions shall not exceed 43.9 lbs/hr and 192.3 tons/yr.</p> <p>SO₂ emissions shall not exceed 0.5 lb/mmBtu actual heat input, 105.0 lbs/hr and 460.0 tons/yr.</p> <p>The height of the stack serving this emissions unit shall be at least 400 feet above ground level.</p>
e.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to 40 CFR, Part 60, Subpart Db.
f.	OAC rule 3745-18-53(A)(2)	The SO ₂ emission limitation specified by this rule is less stringent than the SO ₂ emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
g.	40 CFR part 63, Subpart DDDDD	See b)(2)i. through b)(2)m.

(2) Additional Terms and Conditions

- a. The installation of this emissions unit did not trigger the applicability of 40 CFR Part 52.21 (Prevention of Significant Deterioration) for particulates, nitrogen oxides, sulfur dioxide and carbon monoxide due to contemporaneous, permanent shutdown of emissions unit B014. Emissions unit B014 was 1,131 mmBtu/hr rated, coal-fired boiler which was shutdown prior to the start-up of emissions units B015 and B016.
- b. This emissions unit was designed and constructed as a 'high heat release rate' steam generating unit. As specified in 40 CFR Part 60, Subpart Db, Section 60.41b, 'high heat release rate' unit means a heat release rate greater than 70,000 Btu/hr-cubic ft.
- c. This emissions unit is not subject to the sulfur dioxide compliance and performance testing requirements specified in Subpart Db, Section 60.45b and the sulfur dioxide emission monitoring requirements specified in Section 60.47b, because the emissions unit is restricted to firing only 'very low sulfur oil', as defined in Section 60.41b and c)(1) below.
- d. The height of the stack serving this emissions unit shall be at least 400 ft. above ground-level.
- e. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid

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

- f. The continuous opacity monitoring system consists of all the equipment used to acquire data and record opacity.
- g. The permittee shall maintain a written quality assurance/quality control plan for the continuous NO_x monitoring system, designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

- h. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
- i. The terms in this permit identify the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) contained in 40 CFR Part 63, Subpart DDDDD and are meant to help the permittee maintain compliance with this NESHAP. The requirements of this Subpart apply to the facility's boilers and process heaters according to their applicable subcategory, as identified in 40 CFR 63.7499 and as defined in 40 CFR 63.7575.

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

- j. The following boiler(s) is/are designed to only burn gas 1 fuels (subcategory) and therefore is/are not subject to the emission limits in Table 2 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler(s) is/are subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and the existing boilers must be included in the one-time energy assessment, performed in accordance with Table 3, #4 of the subpart:

B015 and B016.

[Authority for term: 40 CFR 63.7500(e) and 40 CFR 63.7540(a)(10) through (13)]

- k. Emissions units B015 and B016 are existing boilers, as defined in Subpart DDDDD, and are therefore subject to the compliance date specified in Section 63.7495(b) of January 31, 2016 for existing boiler units.

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

- l. For each existing boiler, a one-time energy assessment must be performed by a qualified energy assessor no later than 1/31/16. The one-time energy assessment for existing units must include the following:

- i) a visual inspection of the boiler system;
- ii) an evaluation of operating characteristics of the boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
- iii) an inventory of major energy use systems consuming energy from affected boilers, which are under the control of the boiler operator;
- iv) a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
- v) a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
- vi) a list of cost-effective energy conservation measures that are within the permittee's control;
- vii) a list of the energy savings potential of the energy conservation measures identified; and
- viii) a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.

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

- m. Following the initial compliance date, tune-ups must be conducted for each boiler within the applicable annual schedule as specified in 40 CFR 63.7540(a)(10) through (13), and Table 3 to the subpart. An initial tune-up must be completed for an existing boiler no later than 1/31/16; unless the boiler is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the boiler.

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

c) Operational Restrictions

- (1) The permittee shall fire only natural gas or 'very low sulfur oil' in this emissions unit.

As defined in Section 60.41b of Subpart Db, 'very low sulfur oil' means an oil that contains no more than 0.5 weight percent sulfur or that, when combusted without sulfur dioxide control, has a sulfur dioxide emission rate equal to or less than 0.5 lb/mmBtu, heat input.

[Authority for term: 40 CFR Part 60, Subpart Db]

- (2) After the compliance date specified in Subpart DDDDD, Section 63.7495(b), of January 31, 2016 for existing boiler units, emissions units B015 and B016 shall be operated as units designed to burn gas 1 fuels only. Gaseous fuel boilers may burn liquid fuel for periodic testing of liquid fuel, maintenance or operator training, not to exceed 48 hours during any calendar year.

Also, per definition in Subpart DDDDD, gaseous fuel boilers may burn liquid fuels during periods of gas curtailment or gas supply interruptions of any duration and still meet the definition of gaseous fuel boilers.

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

d) Monitoring and/or Recordkeeping Requirements

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

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

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

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

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;

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

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

- (3) For each shipment of 'very low sulfur oil' received for burning in this emissions unit, the permittee shall 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.

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 D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rules 3745-18-04(E)(3) and 3745-18-04(I)]

- (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 NOx monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6. The letter(s)/document(s) 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), 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

- (5) The permittee shall operate and maintain equipment to continuously monitor and record NOx 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.

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

- a. emissions of NOx in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of NOx in pounds per hour and in units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits;
- 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, continuous NOx monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NOx monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NOx 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 60.13 and 40 CFR Part 60, Appendices B & F]

- (6) The permittee shall maintain daily records of the following information:
- a. the amount of natural gas and/or 'very low sulfur oil' fired in this emissions unit; and
 - b. a record of the type and quantity of fuel, other than natural gas and 'very low sulfur oil', that is fired in this emissions unit.

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

- (7) The permittee shall maintain monthly records of the calculated annual capacity factors for natural gas and 'very low sulfur oil'. The annual capacity factors shall be determined on a rolling, 12-month average basis, with a new annual capacity factor calculated at the end of each calendar month.

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

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

63.7535	monitoring & data collection requirements
63.7540	continuous compliance requirements
63.7555	required records
63.7560	record keeping form and duration
63.7565	records required by Part 63, Subpart A

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

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) the total operating time (hours) of the emissions unit;
 - vi) the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii) the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;
 - viii) the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
 - ix) the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

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 of whether there is an exceedance of the opacity limit

[Authority for term: 40 CFR 60.7]

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NOx 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 NOx emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 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_x 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_x 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_x monitoring system while the emissions unit was in operation;
- viii) results and dates of quarterly cylinder gas audits;
- 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_x 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 NO_x monitoring system, emissions unit, and/or control equipment;
- xii) the date, time, and duration of any downtime** of the continuous NO_x monitoring system and/or control equipment 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.

* 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: 40 CFR 60.7]



Effective Date: To be entered upon final issuance

- (3) The permittee shall submit quarterly reports at the end of each calendar quarter to Ohio EPA, Northeast District Office that:
 - a. certify that only natural gas and/or 'very low sulfur oil' was fired in this emissions unit during the previous calendar quarter; and
 - b. report the annual capacity factors for natural gas and 'very low sulfur oil' over the previous 12 months.

The quarterly reports shall be submitted in accordance with the Part A., Standard Terms and Conditions, A.2.c) of this permit.

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

- (4) The permittee shall submit semi-annual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart DDDDD, per the following sections:

63.7545	submit all required notifications
63.7545(B)	initial notification
63.7550	required reports
63.7550(a)	schedule of Table 9 reports
63.7550(b)(1)	first compliance report

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

f) Testing Requirements

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

a. Emission Limitation:

PE shall not exceed 0.02 lb/mmBtu of actual heat input, and 4.39 lbs/hr and 19.23 tons/yr.

Applicable Compliance Method:

When firing number 2 fuel oil, compliance with these emission limitations may be based upon an emission factor of 0.012 lb of PE/mmBtu (derived from the results of PE testing of this emissions unit performed on December 10, 1997) and the heat input records required pursuant to section d) above.

When firing natural gas, compliance may be demonstrated by multiplying an emission factor of 1.9 lbs of PE/mm cubic ft. of gas by the emissions unit's maximum hourly natural gas firing rate, 0.2195 mm cubic ft./hr, and dividing by the units total hear input capacity, 219.5 mmBtu/hr. The emission factor is listed in US EPA reference document AP-42, Fifth Ed., 'Compilation of Emission Factors', Section 1.4, Table 1.4-2.

The hourly PE limitation was established by multiplying the 0.02 lb PE/mmBtu limitation by the maximum heat input (219.5 mmBtu/hr). Therefore, as long as compliance with the 0.,02 lb PE/mmBtu limitation is maintained, compliance with the hourly PE limitation shall be demonstrated. e.

The annual PE limitation was established by multiplying the hourly PE limitation by 8760, and then dividing by 8760. Therefore, as long as compliance with the hourly PE limitation is shown, compliance with the annual PE limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly and lb/mmBtu emission limitations based on the results of emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-17-10(B)]

b. Emission Limitation:

CO emissions shall not exceed 0.09 lb/mmBtu of actual heat input, and 19.76 lbs/hr and 86.53 tons/yr.

Applicable Compliance Method:

When firing number 2 fuel oil, compliance with these emission limitations may be based upon an emission factor of 0.021 lb of CO/mmBtu (derived from the results of CO testing of this emissions unit performed on December 10, 1997) and the heat input records required pursuant to section d) above.

When firing natural gas, compliance may be demonstrated by multiplying an emission factor of 84 lbs of CO/mm cubic ft. of gas by the emissions unit's maximum hourly natural gas firing rate, 0.2195 mm cubic ft./hr, and dividing by the units total hear input capacity, 219.5 mmBtu/hr. The emission factor is listed in US EPA reference document AP-42, Fifth Ed., 'Compilation of Emission Factors', Section 1.4, Table 1.4-1.

The hourly CO emission limitation was established by multiplying the 0.09 lb CO/mmBtu emission limitation by the maximum heat input (219.5 mmBtu/hr). Therefore, as long as compliance with the 0.,09 lb CO/mmBtu limitation is maintained, compliance with the hourly CO emission limitation shall be demonstrated.

The annual CO emission limitation was established by multiplying the hourly CO emission limitation by 8760, and then dividing by 8760. Therefore, as long as compliance with the hourly CO emission limitation is shown, compliance with the annual CO emission limitation shall be demonstrated

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

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

c. Emission Limitation:

SO₂ emissions shall not exceed 0.05 lb/mmBtu of actual heat input, and 105.0 lbs/hr and 460.0 tons/yr.

Applicable Compliance Method:

When firing number 2 fuel oil, compliance with the allowable SO₂ emission limitations may be demonstrated by documenting that the sulfur content of each shipment of number 2 fuel oil received meets the limitation on an 'as-received' basis.

When firing natural gas, compliance may be demonstrated by multiplying an emission factor of 10.6 lb of SO₂/mm cubic ft. of gas by the emissions unit's maximum hourly natural gas firing rate, 0.2195 mm cubic ft./hr, and dividing by the units total heat input capacity, 219.5 mmBtu/hr. The emission factor is listed in US EPA reference document AP-42, Fifth Ed., 'Compilation of Emission Factors', Section 1.4, Table 1.4-2.

The hourly SO₂ emission limitation was established by multiplying 0.5 lb SO₂/mmBtu emission limitation (from 40 CFR Part 60, Subpart Db) by the maximum heat input when firing no. 2 fuel oil (210 mmBtu/hr). Therefore, as long as compliance with the 0.5 lb SO₂/mmBtu limitation is maintained, compliance with the hourly SO₂ emission limitation shall be demonstrated.

The annual SO₂ emission limitation was established by multiplying the hourly SO₂ emission limitation by 8760, and then dividing by 8760. Therefore, as long as compliance with the hourly SO₂ emission limitation is maintained, compliance with the annual SO₂ emission limitation shall be demonstrated.

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

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-18-53(A)]



d. Emission Limitation:

NOx emissions shall not exceed 0.20 lb/mmBtu of actual heat input, 43.9 lbs/hr and 192.3 tons/yr.

Applicable Compliance Method:

The data from the continuous nitrogen oxide monitoring system may be used to demonstrate compliance with the lb/mmBtu and lbs/hr emission limitations.

Ongoing compliance with the NOx emissions limitations contained in this permit, 40 CFR Part 60, 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.

Compliance with the annual emission limitation shall be demonstrated based upon the monitoring and the record keeping requirements specified in d) and e) above.

The annual NOx emission limitation was established by multiplying the hourly NOx emission limitation by 8760, and then dividing by 8760. Therefore, as long as compliance with the hourly NOx emission limitation is shown, compliance with the annual NOx emission limitation shall be demonstrated

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

[Authority for term: OAC rules 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendices B & F]

e. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27%.

Applicable Compliance Method:

Ongoing compliance with the 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.



Draft Title V Permit
Avon Lake Power Plant
Permit Number: P0085253
Facility ID: 0247030013

Effective Date: To be entered upon final issuance

If required, compliance shall be demonstrated through visible PE 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 40 CFR Part 60, Appendix B)

g) Miscellaneous Requirements

- (1) None.