



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

9/21/2016

Certified Mail

Larry Waite  
W. H. Zimmer Power Station  
1500 Eastport Plaza Drive  
Collinsville, IL 62223

Facility ID: 1413090154  
Permit Number: P0105126  
County: Clermont

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

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 5/3/2016. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

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

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

and Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219

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

Sincerely,

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

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

Cc: Southwest Ohio Air Quality Agency





## Response to Comments

Facility ID:	1413090154
Facility Name:	W. H. Zimmer Power Station
Facility Description:	Electric Power Generating Facility
Facility Address:	1781 US Route 52 Moscow, OH 45153-9705 Clermont County
Permit:	P0105126, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Clermont Sun on 05/12/2016. The comment period ended on 06/11/2016.	
Hearing date (if held)	NA
Hearing Public Notice Date (if different from draft public notice)	NA

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

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

Comments from US EPA, Region V, dated 6/13/2016, including additional email, dated 7/7/2016:

**1. Topic: Section B. Facility-Wide Requirements – Transport Rule**

- a. Comment: Permit condition B.14.b) should also include that the unit is subject to the SO<sub>2</sub> Group 1 Trading Program requirements.

Response: Ohio EPA will correct this omission in the term.

**2. Topic: Section C. Emissions Unit B006 – 40 CFR Part 63, Subpart UUUUU**

- a. Comment: Permit condition b)(1)g. should clarify that the emission limitations from Table 2 of Subpart UUUUU are from coal-fired units not using low rank virgin coal.

Response: Ohio EPA will make this clarification to the term.

- b. Comment: Permit condition c)(3) should be more specific as to which requirements from Tables 3 and 4 of Subpart UUUUU apply to this source.



Response: Ohio EPA will make corrections to the term to include the specific Table 3 requirements. This source does not employ PM CPMS, therefore Table 4 does not apply.

- c. Comment: Permit condition f)(1)e. states compliance with the CO emission limitation of 1,406 TPY is based on AP-42 emission factors and coal usage records and that emission testing is optional. The permit should require emission testing to verify the accuracy of the emission factors.

Response: Ohio EPA has included emission testing for CO in term f)(3) to verify the accuracy of the emission factor.

- d. Comment: Permit condition f)(1)f. states compliance with the VOC emission limitation of 84 TPY is based on emission factors and the maximum rated heat input capacity and that emission testing is optional. The permit should require emission testing to verify the accuracy of the emission factors.

Response: Ohio EPA has included emission testing for VOC in term f)(3) to verify the accuracy of the emission factor.

**3. Topic: Section C. Emissions Units P901, P902, and P903 – Visible Emission Checks**

- a. Comment: Permit conditions 6.d)(1), 7.d)(2), and 8.d)(1) require the permittee to perform weekly visible emission checks “when the weather conditions allow.” Clarify the criteria for determining when weather conditions allow for these visible emission checks.

Response: The terms that require visible emission checks “when weather conditions allow” are part of Ohio EPA’s Permit Terms and Conditions Library. Ohio EPA developed the visible particulate emissions check terms with the concurrence of Region V permitting staff during the initial round of Title V permits to satisfy OAC Chapter 77 gap-filling requirements for sources subject to visible particulate emission limitations. The visible particulate emissions check terms provide an ongoing approach for evaluating a source’s visible particulate emissions without performing formal Method 9 observations for a specified duration, on a set frequency, when the source’s visible particulate emissions have not been a problem and are typically below the applicable emission limitations. The provision for “when weather conditions allow” is a common sense clarification to ensure that the observations are taken under conditions that would provide representative readings. As you may be aware, high winds, heavy rain or snow, or fog can impact the ability to obtain and document representative observations. As mentioned above, this is a common sense provision and does not specify criteria for every possible weather condition that could preclude an observer’s ability to obtain representative readings.

**4. Topic: Section C. Emissions Units P901 and P903 – Particulate Emissions**

- a. Comment: Permit conditions 6.f)(1)a. and 8.f)(1)a. use weekly visible emission checks to determine compliance with the PE limitation of 0.03 gr/dscf. The permit and/or the permit record should adequately demonstrate how the visible emission checks correlate to compliance with the 0.03 gr/dscf limit.

Response: Ohio EPA agrees that the permit terms as written may be confusing as to suggest that there is a direct compliance correlation between the visible emission checks and the mass particulate emission rate. The permit terms require the permittee to conduct and document visible emissions checks of the control device exhaust stacks which are subject to the PE



limitation. Pursuant to Ohio EPA Engineering Guide #16, since the annual allowable particulate emission rate is <100 TPY and the actual particulate emissions of these sources is <1 TPY from any one control device, no emissions testing is specifically required to be included in the permit terms to demonstrate compliance with the PE limitation. Therefore, the results of the visible emissions checks will be used as an indicator of potential noncompliance. If appropriate, and when required in accordance with OAC rule 3745-15-04(A) based upon visible emission check results, compliance shall be demonstrated by conducting emissions tests in accordance with Method 5. Ohio EPA has revised both the permit terms and the Statement of Basis (permit record) to address this comment and provide further clarification.

**5. Topic: Section C. Emissions Units B007 and B008 – Emission Limitations**

- a. Comment: Permit condition b)(2)c. states that the BAT limits listed below will no longer apply after SIP approval, however, the permit does not specify which limits will apply after such approval. The permit must clarify the emission limits that would apply to the sources after the SIP approval action is completed.

Response: The permit term in b)(1)e. which refers to b)(2)d. was intended to indicate that the federally enforceable emission limitations cited would remain in effect upon SIP approval, however, Ohio EPA agrees this may not be clearly understood. Ohio EPA has revised term b)(2)d. to clarify which emission limitations will be in effect after approval of the less than 10 ton per year BAT exemption in the SIP.

- b. Comment: These emissions units are subject to a synthetic minor NO<sub>x</sub> limitation of 39.8 TPY in b)(1)a. In addition, the emissions units are subject to a NO<sub>x</sub> limit of 0.10 lb/MMBtu in b)(1)b. Compliance with the 0.10 lb/MMBtu limitation is to be determined by emissions testing as described in permit condition f)(2). Permit condition d)(5)(l) states that monthly NO<sub>x</sub> emissions are to be calculated based on the NO<sub>x</sub> emission rate derived from the test results in f)(2). The permit should clarify how compliance with the 0.10 lb/MMBtu limit assures compliance with the 39.8 TPY limit.

Response: Ohio EPA has revised term f)(1)g. to clarify how compliance with the 39.8 TPY NO<sub>x</sub> limitation is demonstrated based on the heat input restriction and the emissions testing conducted for this pollutant.

**6. Topic: Section C. Emissions Unit F002 – Testing Requirement**

- a. Comment: Permit condition f)(1)a. requires a Method 9 test for the 5% opacity limitation; however, the permit does not clarify the frequency of this Method 9 test.

Response: Term f)(1)a. states "If required, compliance with the visible emissions of fugitive dust limitation listed above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources". If the records from the fugitive visible emissions monitoring checks indicate an abnormal pattern of visible emissions of fugitive and/or potential noncompliance, then testing would be required pursuant to OAC rule 3745-15-04(A) to demonstrate compliance with the visible emissions of fugitive dust limitation in accordance with Method 9 procedures. The requirement for the permittee to conduct the testing may be based upon the results of the daily checks; however, the Ohio EPA is not precluded from taking formal Method 9 observations at any time.



Ohio EPA has revised both the permit term and the Statement of Basis (permit record) to address this comment and provide further clarification.

Comments from Dynegy Zimmer LLC, dated 6/10/2016:

**1. Topic: Section B. Facility-Wide Requirements – Insignificant Emissions Unit B016**

- a. Comment: Insignificant emissions unit B016 (3.2 MMBtu/hr gas-fired incoming gas transmission line heater) is not owned or operated by Dynegy Zimmer LLC.

Response: Ohio EPA will remove this insignificant emissions unit from the Title V Operating Permit renewal. The Southwest Ohio Air Quality Agency will work with Duke Energy and Dynegy to properly re-assign and permit this source in the eBiz Air Services system.

**2. Topic: Section C. Emissions Unit B006 - Unit 1, B&W Pulverized Coal-Fired Boiler**

- a. Comment: Regarding term C.1.b)(2)(i), request rewording of this term as it applies to the various continuous emissions monitoring systems.

Response: Ohio EPA notes that this term reflects the specific language found in the CAM rule 40 CFR 64.7(b), therefore we cannot make the requested changes to the term. However, Ohio EPA will revise the term and condition to clarify that this is a CAM term and applies to the monitoring systems employed under CAM, which is the continuous opacity monitoring system.

- b. Comment: Regarding term C.1.e)(1)(b), the term assumes a deviation occurs if the fuel oil exceeds the stated SO<sub>2</sub> emissions limitation based on fuel analysis, but the SO<sub>2</sub> emissions limitation cited is measured by the CEM as a 30-day rolling average.

Response: Upon review, Ohio EPA agrees that this fuel oil requirement was cited incorrectly. The use of fuel oil during start-up was approved under the recent Director's Environmentally Beneficial Project (EBP) determination which reflected a maximum fuel oil sulfur content of 0.5% by weight. Therefore, term and condition C.1.b)(2)k. has been added to explain the approved use of fuels during start-up and conditions associated with the Directors EBP determinations and term C.1.e)(1)(b) has been revised for the appropriate deviation reporting.

- c. Comment: Permit term C.1.f)(1)(c) implies that demonstrating compliance with the pound per MMBtu SO<sub>2</sub> emission limitation equates to the 91% reduction requirement, however, these are two separate permit conditions.

Response: Ohio EPA agrees and will remove this statement from the term. Compliance with both the SO<sub>2</sub> emission limitation, in pound per MMBtu, and the percent SO<sub>2</sub> reduction requirement is demonstrated by the monitoring and record keeping (i.e CEMs and coal sampling).

- d. Comment: Regarding term C.1.f)(2)(h), request that the term clarify the report requirement include the "six-minute" continuous opacity monitoring data.

Response: Ohio EPA agrees to make this change to the term.



**3. Topic: Section C. Emissions Unit F001 – Plant Roadways and Parking Areas**

- a. Comment: Term C.2.b)(1)a. is missing reference to the visible emissions standard in OAC rule 3745-17-07 for unpaved roadways. (Same comment applies to emissions unit F101).

Response: The underlying PTI 14-1036 for emissions unit F001 and the underlying PTI 14-1393 for emissions unit F101 (formerly F001) do not specifically cite an opacity limit for unpaved roadways from OAC rule 3745-17-07 because this rule, by itself, is not applicable in non-Appendix A areas. However, the PTIs do apply the RACT (as RACM) fugitive dust control requirements as found in OAC rule 3745-17-08, but such requirements are established under BAT/BACT rules. The RACT/RACM fugitive dust control requirements stipulate that the adequacy of control measures implemented under RACT/RACM shall be determined by compliance with the associated RACT/RACM opacity limitation. Therefore, the RACT/RACM opacity limitation for unpaved roadways, no visible emissions except for a period not to exceed 13 minutes during any 60-minute period, would also be applicable under BAT/BACT, as was cited in the prior Title V permit issued 11/18/2004. Ohio EPA will revise the terms under F001 and F101 to correct the unpaved roadway requirements under BAT/BACT.

- b. Comment: Regarding term C.2.f)(1)(a), request rewording of the Method 9 visible emission testing to include the wording “if required” similar to permit terms for emissions units B006 and B007/B008. (Same comment applies to emissions units F002, F101, F102, P901, P902, and P903).

Response: Ohio EPA will agree to add terms to clarify that testing is not specifically required, but may be required pursuant to OAC rule 3745-15-04. For example, results of inspections or review of the records and reports of the daily/weekly visible emission checks conducted by the facility may result in a requirement to perform the visible emission observations using the appropriate test methods in order to determine compliance with the visible emission limitation. This requirement would be authorized under the provisions of OAC rule 3745-15-04.

**4. Topic: Section C. Emissions Units F101 – Landfill Parking and Roadways**

- a. Comment: Regarding term C.4.d)(2), request removal of the statement “except if the next required inspection is within one week” to reflect that daily inspections are required for this emissions unit.

Response: Ohio EPA agrees and will make this change to this term and to similar terms found in the sections for F001 and F002.

**5. Topic: Section C. Emissions Unit P902 – Fly Ash Handling System**

- a. Comment: Regarding terms C.7.c)(6) and C.7.d)(1), request replacement of the statement “while the emissions unit is in operation” to “while at least one fly ash blower is in operation” since emissions through the baghouse system are possible only when the fly ash blowers are operating.

Response: Ohio EPA agrees to make this change to the terms.



**6. Topic: Section C. Emissions Units B007 and B008 – Natural Gas-fired Auxiliary Boilers**

- a. Comment: Regarding terms C.9.b)(1)a., C.9.d)(5)l., C.9.d)(5)m., C.9.e)(2)g., and C.9.f)(2)g., the applicable underlying annual emissions limitations in PTI P0111498 for SO<sub>2</sub> and VOC are not synthetic minor 12-month rolling limitations; therefore, request that the terms be revised to reflect the PTI.

Response: Upon review of PTI P0111498, Ohio EPA agrees and will make this change to the terms.

- b. Comment: Term C.9.e)(2)(c) requires deviation reporting of the nitrogen content of the fuel oil, however, the permit does not contain any fuel sampling or record keeping requirements for nitrogen content. These requirements are found in the underlying PTI P0111498 for these emissions units and should be added to the Title V permit.

Response: Ohio EPA agrees and will make changes to the terms to include the appropriate fuel sampling and record keeping for nitrogen content as found in PTI P0111498.

- c. Comment: Regarding term C.9.e)(5), request that the initial start-up notification reporting requirement in 60.49b(a) be removed since these emissions units are existing sources.

Response: Ohio EPA agrees to make this change to the term.



## **PRELIMINARY PROPOSED**

### **Division of Air Pollution Control Title V Permit for W. H. Zimmer Power Station**

Facility ID:	1413090154
Permit Number:	P0105126
Permit Type:	Renewal
Issued:	9/21/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
W. H. Zimmer Power Station

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**Preliminary Proposed Title V Permit**

W. H. Zimmer Power Station

**Permit Number:** P0105126

**Facility ID:** 1413090154

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

## Authorization

Facility ID: 1413090154  
Facility Description: Electric Power Generating Facility  
Application Number(s): A0037528  
Permit Number: P0105126  
Permit Description: Title V renewal permit for the Dynegy Wm. H. Zimmer utility power generating station, which includes one pulverized coal-fired boiler, two gas/oil-fired boilers and heaters, three large diesel engine generators, and multiple fugitive dust sources.  
Permit Type: Renewal  
Issue Date: 9/21/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0097734

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

W. H. Zimmer Power Station  
1781 US Route 52  
Moscow, OH 45153-9705

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Preliminary Proposed Title V Permit**  
W. H. Zimmer Power Station  
**Permit Number:** P0105126  
**Facility ID:** 1413090154  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

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

*(Authority for term: ORC 3704.036(A))*

**2. Monitoring and Related Record Keeping and Reporting Requirements**

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

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

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

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



c) The permittee shall submit required reports in the following manner:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **8. Fees**

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

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

## **9. Marketable Permit Programs**

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

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



**10. Reasonably Anticipated Operating Scenarios**

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

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

**11. Reopening for Cause**

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

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

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

**12. Federal and State Enforceability**

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

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

**13. Compliance Requirements**

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



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

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



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

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

**14. Permit Shield**

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

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

**15. Operational Flexibility**

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

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

## **16. Emergencies**

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

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

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

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

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

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

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

## **18. Compliance Method Requirements**

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

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



**19. Insignificant Activities or Emissions Levels**

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

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

**20. Permit to Install Requirement**

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

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

**21. Air Pollution Nuisance**

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

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

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

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

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

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

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

**23. Title VI Provisions**

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



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

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

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

The permittee shall submit required reports in the following manner:

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

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

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

**26. Inspections and Information Requests**

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



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

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

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

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

**28. Permit Transfers**

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

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

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

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

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

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



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

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



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



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
  
2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

B005	300 hp Diesel fire pump (PTI 18-101, 7/31/1974)
B009	490 hp Diesel fire pump (PTI 14-2026, 11/15/1990)
B010	3.75 MMBtu/hr fuel oil-fired heater #3 coal station (PTI 14-2026, 11/15/1990)
B011	3.125 MMBtu/hr fuel oil-fired heater #4 coal station (PTI 14-2026, 11/15/1990)
B012	4.063 MMBtu/hr fuel oil-fired heater #5 coal station (PTI 14-2026, 11/15/1990)
B013	3.125 MMBtu/hr fuel oil-fired heater, FGD building (PTI 14-2026, 11/15/1990)
F003	Gypsum handling (PTI 14-04790, 11/6/2001)
F004	Gypsum storage pile (PTI 14-04790, 11/6/2001)
G001	2,500 gallon gasoline storage tank and dispensing (PTI 14-1677, 2/1/1989)
G002	20,000 gallon diesel fuel storage tank and dispensing (PTI 14-1677, 2/1/1989)
L001	Maintenance shop parts degreaser (PTI 14-2170, 10/31/1990)
P904	FGD waste treatment system (PTI 14-1036, 2/5/1987, modified 4/1/1992)
T001	6,000 gallon fuel oil storage tank #3 coal station (PTI 14-1677, 2/1/1989)
T002	6,000 gallon fuel oil storage tank #4 coal station (PTI 14-1677, 2/1/1989)
T003	6,000 gallon fuel oil storage tank #5 coal station (PTI 14-1677, 2/1/1989)
T004	6,000 gallon fuel oil storage tank FGD building (PTI 14-1677, 2/1/1989)
T005	2,500 gallon fiberglass ignition oil drain storage tank (PTI 14-1677, 2/1/1989)
T006	41,500 gallon diesel fuel oil storage tank 1-A (PTI 14-2025, 4/18/1990)
T007	41,500 gallon diesel fuel oil storage tank 1-B (PTI 14-2025, 4/18/1990)
T008	41,500 gallon diesel fuel oil storage tank 1-C (PTI 14-2025, 4/18/1990)



T009	10,000 gallon sulfuric acid storage tank (PTI 14-2025, 4/18/1990)
T010	550 gallon diesel storage day tank 1-A (PTI 14-2025, 4/18/1990)
T011	550 gallon diesel storage day tank 1-B (PTI 14-2025, 4/18/1990)
T012	550 gallon diesel storage day tank 1-C (PTI 14-2025, 4/18/1990)
T013	4,000 gallon surface water/fuel oil spill containment tank (PTI 14-2026, 11/15/1990)
T014	1,500,000 gallon fuel oil storage tank #1 (PTI 14-2026, 11/15/1990)
T015	1,500,000 gallon fuel oil storage tank #2 (PTI 14-2026, 11/15/1990)
T017	15,000 gallon sulfuric acid storage tank (PTI 14-04790, 11/6/2001)

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

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

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

- 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)*

- The following emissions units 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: B007, B008, B010, B011, B012, and B013. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

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

- 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: B006. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

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

7. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines: B001, B002, B003, B005, and B009. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

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

8. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subparts A and Da, Standards of Performance for Electric Utility Steam Generating Units (NSPS): B006. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

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

9. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (NSPS): B007 and B008. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

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

10. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subparts A and Y, Standards of Performance for Coal Preparation and Processing Plants (NSPS): P901. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

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

11. The Southwest Ohio Air Quality Agency has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee on 4/28/2016, pursuant to 40 CFR Part 64, for emissions unit B006. The permittee shall comply with the provisions of the plan (as specified in Part C - Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions 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 B006 becomes subject to this rule.

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



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

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

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

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

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

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

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

14. Transportation Rule (TR) Trading Program Requirements

a) The permittee shall comply with all applicable Cross-State Air Pollution Rule (CSAPR) requirements (40 CFR Part 97, Subparts AAAAA – DDDDD) by the compliance date specified in 40 CFR 97, Subparts AAAAA – DDDDD.

b) The TR subject units, and the unit-specific monitoring provisions at this source, are identified in the following table. These units are subject to the requirements for the TR NO<sub>x</sub> Annual Trading Program, TR NO<sub>x</sub> Ozone Season Trading Program, and/or TR SO<sub>2</sub> Group 1 Trading Program.

<p><u>Unit ID:</u> B006 1426 MW B&amp;W pulverized coal-fired boiler, Unit 1</p>
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Parameter	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO <sub>2</sub> monitoring) and 40 CFR part 75, subpart H (for NO <sub>x</sub> monitoring)	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E	Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19	EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E
SO <sub>2</sub>	x				
NO <sub>x</sub>	x				
Heat input					

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



Trading Program), 97.535 (TR NOx Ozone Season Trading Program), and 97.635 (TR SO<sub>2</sub> Group 1 Trading Program). The Administrator’s response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on EPA’s website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.

g) The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NOx Annual Trading Program), 97.530 through 97.534 (TR NOx Ozone Season Trading Program), and 97.630 through 97.634 (TR SO<sub>2</sub> Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add to or change this unit’s monitoring system description.

h) TR NOx Annual Trading Program requirements

Designated representative requirements	97.406(a), 97.413-97.418
Emissions monitoring, reporting and recordkeeping requirements	97.406(b), 97.430-97.435
NOx emissions requirements	97.406(c)
Title V permit revision requirements	97.406(d)
Additional recordkeeping and reporting requirements	97.406(e)
Liability	97.406(f)
Effect on other authorities	97.406(g)

i) TR NOx Ozone Season Trading Program requirements

Designated representative requirements	97.506(a), 97.513-97.518
Emissions monitoring, reporting and recordkeeping requirements	97.506(b), 97.530-97.535
NOx emissions requirements	97.506(c)
Title V permit revision requirements	97.506(d)
Additional recordkeeping and reporting requirements	97.506(e)
Liability	97.506(f)
Effect on other authorities	97.506(g)

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

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

(Authority for term: 40 CFR Part 97)



15. The following abbreviations are used throughout this permit:

ESP = Electrostatic precipitator

FGD = Flue gas desulfurization

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

CO = Carbon Monoxide

CO<sub>2</sub> = 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"

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

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

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

HAP = Hazardous Air Pollutant

GHG = Greenhouse gas

TPY = Ton(s) per year

MMBtu = million British thermal units

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



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



**1. B006, Unit 1**

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

1426 MW B&W pulverized coal-fired, dry bottom boiler, having a nominal heat input capacity of 11,968 MMBtu/hr, and equipped with low NOx burners, ESP, and a FGD 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.	<p>OAC rule 3745-31-05(A)(3) (PTI 14-1036, issued 4/1/1992)</p> <p><i>Best Available Technology (BAT)</i></p>	<p>PE shall not exceed 0.025 lb/MMBtu of actual heat input, 1,310 TPY, and 0.5% of the potential emissions (99.5% reduction of the PE).</p> <p>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%.</p> <p>SO<sub>2</sub> emissions shall not exceed 0.548 lb/MMBtu of actual heat input, 28,726 TPY, and 9% of the potential emissions (91% reduction of the SO<sub>2</sub> emissions).</p> <p>NOx emissions shall not exceed 0.60 lb/MMBtu of actual heat input, 31,452 TPY, and 35% of the potential emissions (65% reduction of the NOx emissions).</p> <p>CO emissions shall not exceed 1,406 TPY.</p> <p>VOC emissions shall not exceed 84 TPY.</p> <p>See b)(2)c. and c)(2).</p> <p>Compliance with the requirements of this</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule includes compliance with the requirements of OAC rules 3745-31-11 through 20, and 40 CFR Part 60, Subpart Da.
b.	OAC rules 3745-31-11 through 20 (PTI 14-1036, issued 4/1/1992)  <i>Prevention of Significant Deterioration</i>	SO <sub>2</sub> emissions shall not exceed 1.0 lb/MMBtu of actual heat input, as a 3-hour average.  See b)(2)a., b)(2)b., b)(2)c., and c)(1).
c.	OAC rule 3745-17-07(A)(1)	The visible emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-10(C)(1)	The emission limitation specified by this rule (0.10 lb PE/MMBtu) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-19(A)	The emission limitation specified by this rule (3.6 lb SO <sub>2</sub> /MMBtu) is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR Part 60, Subpart Da [40 CFR 60.40Da – 60.52Da]  <i>Standards of Performance for Electric Utility Steam Generating Units</i>  [In accordance with 40 CFR 60.40Da(a), this emissions unit is an electric utility steam generating unit that is capable of combusting more than 73 megawatts (250 million Btu per hour) heat input of fossil fuel for which construction, modification, or reconstruction commenced after September 18, 1978, but before July 9, 1997, and is subject to the emissions limitations and control measures specified in this section.]	The PE limitation of 0.03 lb/MMBtu of actual heat input specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).  The visible particulate emission limitation specified by this rule is equivalent to the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).  The SO <sub>2</sub> emission limitation of 1.2 lb/MMBtu of actual heat input and 90 percent reduction specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3).  The NO <sub>x</sub> emission limitation of 0.60 lb/MMBtu of actual heat input specified by this rule is equivalent to the NO <sub>x</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3). If the permittee changes the type of solid fuel combusted, the permittee shall comply



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>with all applicable emission limitations (including any less stringent emission limitation) as specified in 60.44Da.</p> <p>See b)(2)j.</p>
g.	<p>40 CFR Part 63, Subpart UUUUU [40 CFR 63.9980-10042]</p> <p><i>National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-fired Electric Utility Steam Generating Units</i></p> <p>[In accordance with 40 CFR 63.9980 to 63.9982 and the definitions in 63.10042, this emissions unit is an existing coal-fired electric utility steam generating unit (EGU), constructed prior to 5/3/11.]</p>	<p>The permittee shall comply with the following emission limitations as specified in 40 CFR 63.9991 and Table 2 (coal-fired unit, not using low rank virgin coal):</p> <p>Mercury (Hg) 1.2E0 lb/TBtu or 1.3E-2 lb/GWh.</p> <p>Comply with either limit:</p> <p>Hydrogen chloride (HCl) 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh; <u>OR</u> Sulfur dioxide (SO<sub>2</sub>) 2.0E-1 lb/MMBtu or 1.5E0 lb/MWh.</p> <p>Comply with one of the following limits:</p> <p>1) 0.03 lb/MMBtu PE or 0.30 lb/MWh PE; <u>OR</u> 2) 5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh of Total non-Hg HAP metals; <u>OR</u> 3) each Individual HAP metal as follows:</p> <p>Antimony (Sb) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;</p> <p>Arsenic (As) 1.1E0 lb/TBtu or 2.0 E-2 lb/GWh;</p> <p>Beryllium (Be) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh;</p> <p>Cadmium (Cd) 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh;</p> <p>Chromium (Cr) 2.8E0 lb/TBtu or 3.0E-2 lb/GWh;</p> <p>Cobalt (Co) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;</p> <p>Lead (Pb) 1.2E0 lb/TBtu or 2.0E-2 lb/GWh;</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Manganese (Mn) 4.0E0 lb/TBtu or 5.0E-2 lb/GWh;  Nickel (Ni) 3.5E0 lb/TBtu or 4.0E-2 lb/GWh; and  Selenium (Se) 5.0E lb/TBtu or 6.0E-2 lb/GWh.  See c)(3).
h.	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.
i.	40 CFR Part 64 [40 CFR 64.1-10]  <i>Compliance Assurance Monitoring (CAM)</i>	See b)(2)d., b)(2)h., b)(2)i., d)(2), d)(3), d)(14) - d)(18), e)(2), e)(10), e)(11), and f)(2).  Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart UUUUU, after the compliance date in that rule.

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), the following control measures constitute BACT for PE, opacity, SO<sub>2</sub>, and NO<sub>x</sub> emissions from this emissions unit:
  - i. the emissions unit shall be equipped with an ESP for PE and opacity control;
  - ii. the emissions unit shall be equipped with a magnesium enhanced lime flue gas desulfurization (FGD) system for SO<sub>2</sub> control; and
  - iii. the emissions unit shall be equipped with low NO<sub>x</sub> burners, compartmentalized windboxes, and reduced heat release in the burner zone for NO<sub>x</sub> control.

- b. The BACT requirements are also satisfied by complying with the PE, opacity, SO<sub>2</sub>, and NO<sub>x</sub> emission limitations established pursuant to OAC rule 3745-31-05(A)(3). The controls and practices that constitute BACT also meet the BAT requirements of 3745-31-05(A)(3).
- c. The emission limitations specified in b)(1)a. and b)(1)b. shall not apply during periods of startup and shutdown.

Start-up for this emissions unit is defined as the period beginning with the initial firing of the emissions unit and ending one hour after the establishment of a stable coal fire. In no event shall a normal start-up period exceed 4 hours unless, the permittee demonstrates, on a case-by-case basis, to the satisfaction of the Director, that a longer time period is needed. Longer start-up periods may result from equipment problems which prevent the establishment of a stable coal fire in the emissions unit.

Shutdown for this emissions unit is defined as the period after the exhaust gases entering the precipitator have fallen below 250 degrees Fahrenheit. In no event shall the shutdown period exceed 3 hours, unless the permittee demonstrates, to the satisfaction of the Director, that a longer time period is required.

- d. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1, and Appendix F, Procedure 3. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, 40 CFR Part 60, Appendices B and F, and 40 CFR Part 64)*

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

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

CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

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

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13 and 40 CFR Part 60, Appendix F, and 40 CFR Part 75)*

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

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

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

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13 and 40 CFR Part 60, Appendix F, and 40 CFR Part 75)*

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

The plan shall include the requirement to conduct relative accuracy test audits for the continuous CO<sub>2</sub> monitoring system in accordance with the frequencies



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

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

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13 and 40 CFR Part 60, Appendix F, and 40 CFR Part 75)*

- h. The opacity, SO<sub>2</sub>, NO<sub>x</sub>, and CO<sub>2</sub> continuous monitoring systems consist of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.2, 40 CFR Part 60, Appendix F, and 40 CFR Part 64)*

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

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

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

- k. Pursuant to the Director's Environmentally Beneficial Project determinations issued February 25, 2014, and April 15, 2016, the use of natural gas shall be permitted for start-up of this emissions unit, and when it is needed for flame stabilization; and, the use of number 2 fuel oil shall be permitted for the start-up of this emissions unit, and when it is needed for flame stabilization, only when the boiler's existing natural gas-fired igniters cannot be used due to natural gas curtailment or supply interruption. Number 2 fuel oil use shall also be permitted for readiness testing of the fuel oil igniters. The quality of the number 2 fuel oil fired in this emissions unit shall have a sulfur content of 0.5% by weight, or less.

*(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-01(SSS)(1)(a)(vi))*



c) Operational Restrictions

- (1) In order to maximize the availability of the FGD system, the permittee shall comply with the following design, construction, and operational requirements:
  - a. The FDG system shall include one spare scrubber module (the actual number of modules shall exceed the number needed to achieve the required 91% reduction of the sulfur dioxide emissions at the emissions unit's maximum operating capacity);
  - b. The lime preparation system shall include on spare ball mill slaker;
  - c. The slurry processing system shall include one spare thickener;
  - d. The FDG system shall include a spare absorber recirculation pump on each absorber;
  - e. The mist eliminator in the scrubber shall be designed and operated in a manner that maximizes efficiency and minimizes solids buildup, including a system for washing the mist eliminators without removal from service;
  - f. The materials used in association with the FGD system shall be selected to minimize corrosion and erosion; and
  - g. The permittee shall develop and maintain a detailed inspection and preventative maintenance plan for the FGD system. The plan shall include inspection frequency and routine maintenance for critical FGD system components. A copy of the plan shall be submitted to the Southwest Ohio Air Quality Agency.

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

- (2) 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(A)(1), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

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

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



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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to verify start-up and shutdown periods for this emissions unit, the permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP during all periods of start-up and during all periods of shutdown. An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64)*

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

The permittee shall maintain records of data obtained by the continuous opacity monitoring system including the following:

- a. percent opacity on an instantaneous (one-minute or less) and 6-minute block average basis;
- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;



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- c. hours of operation of the emissions unit and continuous opacity monitoring system;
- d. the date, time, and hours of operation of the emissions unit without the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous opacity monitoring system; as well as; and
- f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64)*

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 75)*

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

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

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



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- f. hours of operation of the emissions unit and continuous SO<sub>2</sub> monitoring system;
- g. the date, time, and hours of operation of the emissions unit without the continuous SO<sub>2</sub> monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous SO<sub>2</sub> monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, 40 CFR Part 60, Appendix B & F, and 40 CFR Part 75)*

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 75)*

- (7) The permittee shall operate and maintain equipment to continuously monitor and record 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 and 40 CFR Part 75.

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. the average hourly, average daily, and rolling, 30-day average emission rates of NOx in lb/MMBtu actual heat input;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;



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

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, and 40 CFR Part 60, Appendix B and F, and 40 CFR Part 75)*

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 75)*

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

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

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



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

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, 40 CFR Part 60, Appendix B and F, and 40 CFR Part 75)*

- (10) 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), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

- (11) 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), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

- (12) For each shipment of oil received for burning in this emissions unit in accordance with b)(2)k., the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), 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 rules 3745-77-07(C)(1), 3745-18-04(E)(3), 3745-18-04(I), and 3745-31-01(SSS)(1)(a)(vi))*

- (13) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart Da, including the following sections:

60.48Da(q)	Compliance provisions for monitoring opacity
60.48Da(s)	Affirmative defense provisions for exceedances during malfunctions
60.49Da(a)(1)	Continuous opacity monitoring system (COMS) requirements
60.49Da(b)	SO <sub>2</sub> continuous emission monitoring system (CEMS) requirements
60.49Da(c)	NO <sub>x</sub> CEMS requirements
60.49Da(d)	CEMS requirements
60.49Da(e)	CEMS operation requirements
60.49Da(f)(1) and (h)	CEMS minimum data collection requirement and data supplement requirements for when minimum data requirement is not met
60.49Da(g)	Determination of 1-hr averages under 60.13(h)
60.49Da(i)	CEMS performance evaluation methods and procedures
60.49Da(j)	Alternative reference methods and procedures
60.49Da(s)	Unit-specific monitoring plan requirements
60.49Da(w)	SO <sub>2</sub> , NO <sub>x</sub> , and CO <sub>2</sub> CEMS requirements

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

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

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

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

- (15) Whenever the monitored value for opacity varies from the range established in accordance with d)(14) 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;



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- 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)*

- (16) 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)*

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

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)*

- (18) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the PE monitoring requirements specified in 40 CFR 63.10010-10023 may satisfy the monitoring requirements of 40 CFR Part 64 specified in d)(14) - d)(17), if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU. Since the CAM requirements of 40 CFR Part 64 will continue to apply after the date specified in 40 CFR Part 63, Subpart UUUUU, the CAM plan shall be revised at such time to be consistent with the MACT monitoring requirements, if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU.

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



- (19) 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)*

- (20) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-1036, issued on April 1, 1992:d)(1) – d)(19).The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all periods of time during start-up and shutdown of the emissions unit when the start-up, shutdown, and/or temperature of the boiler exhaust gases exceeded the limitations specified in b)(2)c.; and
  - b. any exceedance of the sulfur content, in percent by weight, for the fuel oil combusted in this emissions unit as specified in b)(2)k.

*(Authority for term: OAC rules 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, and OAC rule 3745-31-01(SSS)(1)(a)(vi))*

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:



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- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.
- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
  - i. the facility name and address;
  - ii. the manufacturer and model number of the continuous opacity monitor;
  - iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;
  - iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
  - v. each period of time (start time and date, and end time and date) when the opacity was outside of the range specified in d)(14), the cause of each incident, and the corrective actions taken;
  - vi. the total operating time (hours) of the emissions unit;
  - vii. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
  - viii. the date, time, and duration of any/each malfunction\*\* of the continuous opacity monitoring system and/or emissions unit;
  - ix. the date, time, and duration of any downtime\*\* of the continuous opacity monitoring system while the emissions unit was in operation; and
  - x. the reason (if known) and the corrective actions taken (if any) for each event in (b)(viii) and (ix).

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

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



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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.7, and 40 CFR Part 64)*

- (3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO<sub>2</sub> monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of SO<sub>2</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Part 75, OAC Chapter 3745-18, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous SO<sub>2</sub> and other associated monitors;
    - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
    - iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
    - v. the total SO<sub>2</sub> emissions for the calendar quarter (tons);
    - vi. the total operating time (hours) of the emissions unit;
    - vii. the total operating time of the continuous SO<sub>2</sub> monitoring system while the emissions unit was in operation;
    - viii. results and dates of quarterly cylinder gas audits or linearity checks;
    - ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));



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- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous SO<sub>2</sub> monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\*\* of the continuous SO<sub>2</sub> monitoring system and/or emissions unit;
- xii. the date, time, and duration of any downtime\*\* of the continuous SO<sub>2</sub> monitoring system while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(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 if there is an exceedance of any applicable limit

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.7, and 40 CFR Part 75)*

- (4) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO<sub>x</sub> monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO<sub>x</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Parts 75 and 76, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous NO<sub>x</sub> and other associated monitors;



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- 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 NOx emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous NOx 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 NOx monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\*\* of the continuous NOx monitoring system and/or emissions unit;
- xii. the date, time, and duration of any downtime\*\* of the continuous NOx monitoring system while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term 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: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.7, and 40 CFR Part 75)*



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- (5) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO<sub>2</sub> monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of continuous CO<sub>2</sub> monitoring system downtime and malfunction while the emissions unit was on line.
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous CO<sub>2</sub> and other associated monitors;
    - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
    - iv. the total operating time (hours) of the emissions unit;
    - v. the total operating time of the continuous CO<sub>2</sub> monitoring system while the emissions unit was in operation;
    - vi. results and dates of quarterly cylinder gas audits or linearity checks;
    - vii. unless previously submitted, results and dates of the relative accuracy test audit(s) (during appropriate quarter(s));
    - viii. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO<sub>2</sub> monitor out-of-control and the compliant results following any corrective actions;
    - ix. the date, time, and duration of any/each malfunction\* of the continuous CO<sub>2</sub> monitoring system while the emissions unit was in operation;
    - x. the date, time, and duration of any downtime\* of the continuous CO<sub>2</sub> monitoring system while the emissions unit was in operation; and
    - xi. the reason (if known) and the corrective actions taken (if any) for each event in (b)(ix) and (x).

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

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.7, and 40 CFR Part 75)*

- (6) 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), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, and 40 CFR Part 75)*

- (7) 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), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

- (8) The permittee shall submit quarterly reports that document the following for each day in the calendar quarter:

- a. the 30-day average SO<sub>2</sub> emission rate;
- b. the 30-day average NO<sub>x</sub> emission rate; and,
- c. the percent reduction of the potential SO<sub>2</sub> 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), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, and 40 CFR Part 60, Subpart Da)*

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

60.48Da(s)	Affirmative defense provisions for exceedances during malfunctions
60.51Da(a)	Reporting requirements for performance tests and performance evaluations of continuous monitors
60.51Da(b)	SO <sub>2</sub> and NO <sub>x</sub> reporting
60.51Da(c)	Reporting requirements for when minimum quantity of emission data is not met
60.51Da(e)	Requirements for fuel pretreatment credit
60.51Da(f)	Requirements for signed statement when opacity, SO <sub>2</sub> , or NO <sub>x</sub> emissions data are not available
60.51Da(h)	Requirements for signed compliance statement
60.51Da(i)	Opacity excess emission quarterly reporting requirements
60.51Da(j)	Semi-annual reporting requirements
60.51Da(k)	Electronic quarterly reporting alternative

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

- (10) If the permittee is required under 40 CFR Part 64.8 and d)(17) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

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

- (11) After the compliance date specified in 40 CFR Part 63, Subpart UUUUU, the reporting requirements specified in 40 CFR 63.10030 and 63.10031 may satisfy the reporting requirements of 40 CFR Part 64 contained in e)(2)b.v. and e)(10), if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU. Since the CAM requirements of 40 CFR Part 64 will continue to apply after the



date specified in 40 CFR Part 63, Subpart UUUUU, the CAM plan shall be revised at such time to be consistent with the MACT reporting requirements, if the permittee chooses to comply with the PE limitation specified in Table 2 to 40 CFR Part 63, Subpart UUUUU.

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

- (12) 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)*

- (13) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-1036, issued on April 1, 1992: e)(1) – e)(12). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

PE shall not exceed 0.025 lb/MMBtu of actual heat input, 1,310 TPY, and 0.5% of the potential emissions (99.5% reduction of the PE).



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**Applicable Compliance Method:**

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

Compliance with the PE limitation of 0.025 lb/MMBtu constitutes compliance with the percent reduction requirement for PE.

The annual PE limitation was established by multiplying the pound PE/MMBtu limitation by the maximum heat input of 11968 MMBtu/hr and by 8760, and then dividing by 2000. Therefore, as long as compliance with the pound PE/MMBtu limitation is maintained, compliance with the annual limitation shall be demonstrated.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

**b. 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.

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), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, and 40 CFR Part 60, Appendix B)*

**c. Emission Limitations:**

SO<sub>2</sub> emissions shall not exceed 0.548 lb/MMBtu of actual heat input, 28,726 TPY, and 9% of the potential emissions (91% reduction of the SO<sub>2</sub> emissions).

**Applicable Compliance Method:**

Ongoing compliance with the above SO<sub>2</sub> emission limitations contained in this permit, and in 40 CFR Parts 60 and 75 may be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality



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assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

The annual SO<sub>2</sub> emission limitation was established by multiplying the pound SO<sub>2</sub>/MMBtu emission limitation by the maximum heat input of 11968 MMBtu/hr and by 8760, and then dividing by 2000. Therefore, as long as compliance with the pound SO<sub>2</sub>/MMBtu emission limitation is maintained, compliance with the annual SO<sub>2</sub> emission limitation shall be demonstrated.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, 40 CFR Part 60, Appendix B & F, and 40 CFR Part 75)*

d. Emission Limitations:

NO<sub>x</sub> emissions shall not exceed 0.60 lb/MMBtu of actual heat input, 31,452 TPY, and 35% of the potential emissions (65% reduction of the NO<sub>x</sub> emissions).

Applicable Compliance Method:

Ongoing compliance with the NO<sub>x</sub> 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.

Compliance with the NO<sub>x</sub> emission limitation of 0.60 lb/MMBtu constitutes compliance with the percent reduction requirement for NO<sub>x</sub> emissions.

The annual NO<sub>x</sub> emission limitation was established by multiplying the pound NO<sub>x</sub> /MMBtu emission limitation by the maximum heat input of 11968 MMBtu/hr and by 8760, and then dividing by 2000. Therefore, as long as compliance with the pound NO<sub>x</sub> /MMBtu emission limitation is maintained, compliance with the annual NO<sub>x</sub> emission limitation shall be demonstrated.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR 60.13, 40 CFR Part 60, Appendix B & F, and 40 CFR Part 75)*

e. Emission Limitation:

CO emissions shall not exceed 1,406 TPY.

Applicable Compliance Method:

The annual CO emission limitation above was established by multiplying the maximum annual coal usage rate, in tons per year (assuming operation at 8,760 hours per year), by the emission factor of 0.5 lb CO/ton of coal found in AP-42, Section 1.1, Table 1.1-3, dated 9/98, and then dividing by 2000.



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The permittee shall conduct emission testing in accordance with Method 10 of 40 CFR Part 60, Appendix A, or an alternative approved method, to verify and establish a source-specific emission rate, in lb CO/ton of coal or lb CO/MMBtu. See f)(3).

The actual CO emission rate, in tons per year, shall be calculated from the results of the most recent stack test and the coal usage records required in d)(11) in order to determine compliance with the annual CO emission limitation.

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

f. Emission Limitation:

VOC emissions shall not exceed 84 TPY.

Applicable Compliance Method:

The annual VOC emission limitation above was established by multiplying the emission factor of 0.0016 lb VOC/MMBtu as found in the US EPA report "Emissions of Reactive VOCs from Utility Boilers" (EPA-600/7-80-111), by the maximum rated heat input capacity of the unit at 11,968 MMBtu/hour, then multiplying by 8,760 hours/year, and then dividing by 2000.

The permittee shall conduct emission testing in accordance with Method 25 of 40 CFR Part 60, Appendix A, or an alternative approved method, to verify and establish a source-specific emission rate, in lb VOC/MMBtu or lb VOC/ton of coal. See f)(3).

The actual VOC emission rate, in tons per year, shall be calculated from the results of the most recent stack test and the coal usage records required in d)(11) in order to determine compliance with the annual VOC emission limitation.

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

g. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 1.0 lb/MMBtu of actual heat input, as a 3-hour average.

Applicable Compliance Method:

US EPA Method 6 or Method 6C, as specified in 40 CFR Part 60, Appendix A, shall be used to determine compliance as specified in f)(2) below. The SO<sub>2</sub> continuous emissions monitoring shall not be used to determine compliance with the above SO<sub>2</sub> emission limitation established under BACT. This compliance test methodology (Method 6 or 6C) is not applicable to any other SO<sub>2</sub> emission limitation in this permit.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*



h. Emission Limitations:

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

Comply with either limit:

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

Comply with one of the following limits:

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

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

3) each Individual HAP metal as follows:

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

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

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

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

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)(5) below.

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

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

a. The emission testing shall be conducted approximately 2.5 years after issuance of the permit (following the effective date for the Title V permit) and within 6 months prior to the permit expiration, unless an alternative schedule is approved by the applicable permitting authority to coincide with the testing schedule



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requirements of 40 CFR Subpart UUUUU, but no less frequently than every 2 ½ years or twice during the Title V permit term.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE of 0.025 lb/MMBtu and the SO<sub>2</sub> emission rate of 1.0 lb/MMBtu.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):

For PE: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5B and the procedures in Subpart Da; and

For SO<sub>2</sub>: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 6 or 6C.

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

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.



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- h. The permittee shall include six-minute continuous opacity monitoring data for the time periods during which the above PE testing was conducted in the written reports on the results of the emissions tests.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20, 40 CFR Part 60, Subpart Da, and 40 CFR Part 64)*

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

- a. The emission testing shall be conducted within 6 months after issuance of the permit (following the effective date for the Title V permit).
- b. The emission testing shall be conducted to verify and establish source-specific CO and VOC emission rates, in lb CO/MMBtu or lb CO/ton of coal and lb VOC/MMBtu or lb VOC/ton of coal, used to determine compliance with the annual CO and VOC emission limitations. The emission rates shall be based upon the average of the results from three one-hour test runs for each pollutant.

- c. The following test method(s) shall be employed:

For CO: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 10; and

For VOC: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 25.

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

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire



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data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

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

60.50Da(a)	Performance test requirements
60.50Da(b)	Performance test requirements for particulate standards
60.50Da(c)	Compliance determination requirements for SO <sub>2</sub> standards
60.50Da(d)	Compliance determination requirements for NO <sub>x</sub> standards
60.50Da(e)	Alternative compliance methods and procedures

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

- (5) 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



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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)*

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-1036, issued on April 1, 1992: (f)(1) – f(5). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.



**2. F001, Plant Roads and Parking**

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

Paved and unpaved roadways and parking areas

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-1036, issued 4/1/1992)  <i>Best Available Technology (BAT)</i>	For paved roadways and parking areas: Visible emissions of fugitive dust shall not exceed 5 percent opacity, as a three-minute average.  For unpaved roadways: No visible particulate emissions, except for a period of time not to exceed 13 minutes during any 60-minute period. See b)(2)c.  Compliance with the requirements of this rule includes compliance with the requirements of OAC rules 3745-31-10 through 20.
b.	OAC rules 3745-31-11 through 20 (PTI 14-1036, issued 4/1/1992)  <i>Prevention of Significant Deterioration</i>	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-07(B)(7)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-08(A)(1).



(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), the following control measures constitute BACT for PE from this emissions unit (paved roadways, parking areas, and unpaved roadways):
  - i. periodic flushing with water (paved areas only);
  - ii. periodic application of water or dust suppressants;
  - iii. limiting vehicle speed to 20 mph;
  - iv. covering all trucks hauling potential dust generating material;
  - v. prompt clean-up of spills; and
  - vi. water washing of wheels of haul vehicles.
- b. The BACT requirements are also satisfied by complying with the opacity emission limitations established pursuant to OAC rule 3745-31-05(A)(3). The controls and practices that constitute BACT also meet the BAT requirements of 3745-31-05(A)(3).
- c. For the unpaved roadways, the reasonably available control measure requirements for fugitive dust as found in OAC rule 3745-17-08 shall constitute BAT under OAC rule 3745-31-05(A)(3) even though the emissions unit is not located in an Appendix A area. The fugitive dust control requirements found in OAC rule 3745-17-08 are equivalent to, or less stringent than, the requirements established pursuant to OAC rules 3745-31-11 through 20 in b)(2)a. above. The permittee shall comply with all applicable fugitive emission requirements (including any less stringent requirements) for this emissions unit.
- d. The needed frequencies of implementation of the control measures in b)(2)a. shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved and unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

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

c) Operational Restrictions

- (1) None.

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

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

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

*(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.

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

- (3) The permittee may, upon receipt of written approval from the Southwest Ohio Air Quality Agency, modify the inspection frequencies in d)(1) if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements for fugitive dust.

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

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

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

The information required in d)(4)d. shall be kept separately for (i) the paved roadways and parking areas, and (ii) the unpaved roadways, and 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))*



- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-1036, issued on April 1, 1992: d)(1) – d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

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

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-1036, issued on April 1, 1992: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitations:

For paved roadways and parking areas: Visible emissions of fugitive dust shall not exceed 5 percent opacity, as a three-minute average.

For unpaved roadways: No visible particulate emissions, except for a period of time not to exceed 13 minutes during any 60-minute period.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitation for paved roadways and parking areas listed above shall be determined in accordance with Test Method 9



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as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and OAC rule 3745-17-03, except that the data reduction and average opacity calculation shall be based upon a set of 12 consecutive visible emission observations recorded at 15-second intervals.

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

No Method 9/Method 22 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of fugitive dust monitoring, recordkeeping, and reporting, Method 9/Method 22 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-1036, issued on April 1, 1992: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



**3. F002, Coal and FGD Storage Piles**

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

Coal and FGD waste storage piles

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-1036, issued 4/1/1992)  <i>Best Available Technology (BAT)</i>	Visible emissions of fugitive dust shall not exceed 5 percent opacity, as a three-minute average.  Compliance with the requirements of this rule includes compliance with the requirements of OAC rules 3745-31-10 through 20.
b.	OAC rules 3745-31-11 through 20 (PTI 14-1036, issued 4/1/1992)  <i>Prevention of Significant Deterioration</i>	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-07(B)(7)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-08(A)(1).

(2) Additional Terms and Conditions

a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), the following control measure constitutes BACT for PE from this emissions unit:

i. periodic spraying with water to minimize or eliminate visible emissions of fugitive dust from the coal and FGD waste storage piles.



b. The BACT requirements are also satisfied by complying with the opacity emission limitations established pursuant to OAC rule 3745-31-05(A)(3). The controls and practices that constitute BACT also meet the BAT requirements of 3745-31-05(A)(3).

c. The control measure(s) in b)(2)a. shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

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

d. The control measure(s) in b)(2)a. shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

storage pile identification      minimum load-in/load-out inspection frequency

all                                      daily, when in use

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

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

storage pile identification      minimum wind erosion inspection frequency

all                                      daily

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

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

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

- (4) The permittee may, upon receipt of written approval from the Southwest Ohio Air Quality Agency, modify the inspection frequencies in d)(1) and d)(2) if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements for fugitive dust.

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

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

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

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

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

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-1036, issued on April 1, 1992: d)(1) – d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

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

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-1036, issued on April 1, 1992: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 5 percent opacity, as a three-minute average.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitation listed above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and OAC rule 3745-17-03, except that the data reduction and average opacity calculation shall be based upon a set of 12 consecutive visible emission observations recorded at 15-second intervals.

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of fugitive dust monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).



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*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-1036, issued on April 1, 1992: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
  
- g) Miscellaneous Requirements
  - (1) None.



**4. F101, Landfill Parking & Roads (formerly Y001)**

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

Landfill Roads & Parking (Co-Located Facility ID 1413000309, OEPA ID F001)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-1393, issued 11/2/1988)  <i>Best Available Technology (BAT)</i>	For paved roadways and parking areas: Visible emissions of fugitive dust shall not exceed 5 percent opacity, as a three-minute average.  For unpaved roadways: No visible particulate emissions, except for a period of time not to exceed 13 minutes during any 60-minute period. See b)(2)b.  See b)(2)a.
b.	OAC rule 3745-17-07(B)(7)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-07(B)(11)(e).
c.	OAC rule 3745-17-08(B)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-08(A)(1).

(2) Additional Terms and Conditions

a. The following control measures constitute BAT for PE from this emissions unit (paved roadways, parking areas, and unpaved roadways):

i. the unpaved road to the disposal area in the landfill shall be constructed using gravel and/or bottom ash;



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- ii. suitable dust suppressant chemicals shall be applied at least bimonthly, or as often as necessary, on all unpaved roads and parking areas in order to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic. Water spray alone may be used between the applications of chemical dust suppressant provided compliance with the 5% opacity limit is maintained. Waste oil or brine from oil and gas production wells shall not be used as a dust suppressant;
  - iii. speed zones of no more than 15 miles per hour shall be established, posted, and enforced by the owner or operator for all vehicles operating on unpaved facility roadways. Speed zones of no more than 30 miles per hour shall be established, posted, and enforced by the owner or operator for all vehicles operating on paved facility roadways;
  - iv. all paved roads and parking lots located at this facility shall periodically be swept and/or water flushed of surface material in order to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic;
  - v. transporters of all loads of dusty material shall be required to tarp or cover the material; and
  - vi. water washing of wheels of haul vehicles.
- b. For the unpaved roadways, the reasonably available control measure requirements for fugitive dust as found in OAC rule 3745-17-08 shall constitute BAT under OAC rule 3745-31-05(A)(3) even though the emissions unit is not located in an Appendix A area. The fugitive dust control requirements found in OAC rule 3745-17-08 are equivalent to, or less stringent than, the requirements established pursuant to OAC rule 3745-31-05(A)(3) in b)(2)a. above. The permittee shall comply with all applicable fugitive emission requirements (including any less stringent requirements) for this emissions unit.
- c. The needed frequencies of implementation of the control measures in b)(2)a. shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved and unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

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

c) Operational Restrictions

- (1) None.

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

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

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

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

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

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

- (3) The permittee may, upon receipt of written approval from the Southwest Ohio Air Quality Agency, modify the inspection frequencies in d)(1) if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements for fugitive dust.

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

- (4) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented, including the date and type of chemical suppressant that was applied pursuant to b)(2)a.ii.; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

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

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

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-1393, issued on November 2, 1988: d)(1) – d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

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))*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-1393, issued on November 2, 1988: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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



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a. Emission Limitations:

For paved roadways and parking areas: visible emissions of fugitive dust shall not exceed 5 percent opacity, as a three-minute average.

For unpaved roadways: no visible particulate emissions, except for a period of time not to exceed 13 minutes during any 60-minute period.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitation listed above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and OAC rule 3745-17-03, except that the data reduction and average opacity calculation shall be based upon a set of 12 consecutive visible emission observations recorded at 15-second intervals.

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

No Method 9/Method 22 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of fugitive dust monitoring, recordkeeping, and reporting, Method 9/Method 22 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-1393, issued on November 2, 1988: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



**5. F102, Landfill Operations (formerly Y002)**

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

Landfill Operations (Co-located Facility ID 1413000309, OEPA ID F002)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-1393, issued 11/2/1988)  <i>Best Available Technology (BAT)</i>	For dewatered and stabilized FGD system waste handling: visible emissions of fugitive dust shall not exceed 5 percent opacity, as a three-minute average.  For flyash and other material handling (dewatered bottom ash and pond sediments): visible emissions of fugitive dust shall not exceed 10 percent opacity, as a six-minute average.  See b)(2)a., c)(1), and c)(2).
b.	OAC rule 3745-17-07(B)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-07(B)(11)(e).
c.	OAC rule 3745-17-08(B)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-08(A)(1).

(2) Additional Terms and Conditions

- a. The following control measures constitute BAT for PE from this emissions unit:
  - i. water spray systems shall be employed to minimize or eliminate visible emissions of fugitive dust;
  - ii. the waste from the FGD system shall be maintained in a moist condition;



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- iii. the trucks unloading solid waste shall make use of any natural wind barriers where possible, in order to minimize the fugitive dust emissions caused by the wind during unloading operations;
- iv. any dusty material, including the FGD waste, shall be watered as necessary prior to and during dumping operations in order to minimize or eliminate visible emissions of fugitive dust;
- v. the permittee shall avoid disposing of dusty materials during wind conditions that will cause or contribute to an exceedance of the visible emission limitation; and
- vi. any dusty material to be stored prior to disposal shall be watered, as necessary, or given a temporary soil cover in order to minimize or eliminate visible emissions of fugitive dust.

- b. The control measure(s) in b)(2)a. shall be employed for the landfill operations if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

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

c) Operational Restrictions

- (1) The permit for this emissions unit does not provide for the acceptance of any asbestos or asbestos-containing waste material that is subject to the provisions of the NESHAP, 40 CFR Part 61, Subpart M. No such asbestos or asbestos-containing material may be accepted without first applying for and obtaining a permit to install from the Ohio EPA.

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

- (2) This solid waste disposal facility is only approved for the disposal of dewatered bottom ash and pyrites, flyash, pond sediments, and dewatered and stabilized FGD waste. No other solid wastes, liquids, or semi-solids shall be accepted for disposal. This approval does not provide for acceptance of any hazardous waste.

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

d) Monitoring and/or Recordkeeping Requirements

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



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operation identification

minimum inspection frequency

all landfill material handling areas

daily, when in use

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

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

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

- (3) The permittee may, upon receipt of written approval from the Southwest Ohio Air Quality Agency, modify the inspection frequencies in d)(1) if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements for fugitive dust.

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

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

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

The information required in d)(4)d. shall be 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))*

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-1393, issued on November 2, 1988: d)(1) – d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

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

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-1393, issued on November 2, 1988: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

For dewatered and stabilized FGD system waste handling: visible emissions of fugitive dust shall not exceed 5 percent opacity, as a three-minute average.

For flyash and other material handling (dewatered bottom ash and pond sediments): visible emissions of fugitive dust shall not exceed 10 percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance with the visible fugitive dust limitations listed above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and OAC rule 3745-17-03, except that the data reduction and average opacity calculation shall be based upon a set of 12 consecutive visible emission observations recorded at 15-second intervals.

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of fugitive dust monitoring, recordkeeping, and reporting,



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Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-1393, issued on November 2, 1988: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- g) Miscellaneous Requirements
  - (1) None.



**6. P901, Coal Handling System**

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

Coal Handling System, including barge unloading station, sampling station, conveyor transfer station, silos, crusher station, belt conveyors and controlled with filters/baghouses.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-1036, issued 4/1/1992)  <i>Best Available Technology (BAT)</i>	PE shall not exceed 0.03 grain/dry standard cubic foot from each of the control devices serving this emissions unit.  Visible particulate emissions of fugitive dust shall not exceed 10 percent opacity, as a six-minute average from all coal handling areas.
b.	OAC rules 3745-31-11 through 20 (PTI 14-1036, issued 4/1/1992)  <i>Prevention of Significant Deterioration</i>	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-07(A)	The stack opacity limitation specified by this rule is equivalent to or less stringent than the opacity limitation established pursuant to 40 CFR Part 60, Subpart Y.
d.	OAC rule 3745-17-07(B)(7)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-07(B)(11)(e).
e.	OAC rule 3745-17-08(B)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-08(A)(1).
f.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	<p>40 CFR Part 60, Subpart Y</p> <p><i>Standards of Performance for Coal Preparation and Processing Plants</i></p> <p>[In accordance with 40 CFR 60.250(b) and 60.251, this emissions unit is comprised of coal processing and conveying equipment and transfer and loading systems that commenced construction after October 27, 1974 and on or before April 28, 2008, and are subject to the emission limitations and/or control measures specified in this section.]</p>	<p>The owner or operator shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system or coal transfer and loading system gases which exhibit 20 percent opacity or greater.</p> <p>The opacity limitation specified by this rule is less stringent than the opacity limitation for fugitive dust established pursuant to OAC rule 3745-31-05(A)(3). The permittee shall comply with all applicable emission limitations (including any less stringent emission limitation).</p> <p>See b)(2)c.</p>
h.	<p>40 CFR 60.1 – 19 [40 CFR 60.1(a)]</p>	<p>The provisions of Subpart A apply to the owner or operator of any stationary source which contains an affected facility that commenced construction or modification after the date of publication in 40 CFR Part 60 that is applicable to that facility.</p>

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), the following control measures and design requirements constitute BACT for PE from this emissions unit:
  - i. the barge unloading station 1 shall be equipped with water sprays with a chemical proportioner along with aluminum hoods, skirt boards, rubber sealing strips and rubber curtains at the bucket elevator barge unloader;
  - ii. all belt conveyors shall be enclosed in pipe tubes or with sheet metal covering;
  - iii. transfer stations 4E, A, and B and the transfer to the plant silos shall be totally enclosed with the emissions ducted to filters/baghouses;
  - iv. transfer station 2 shall be equipped with water sprays with a chemical proportioner and shall be totally enclosed with the emissions ducted to filters/baghouses;
  - v. crushing station 3 shall be equipped with water sprays with a chemical proportioner and shall be totally enclosed;



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- vi. crushing station 5 shall be totally enclosed; and
  - vii. sampling station 4 and 6 shall be totally enclosed.
- b. The BACT requirements are also satisfied by complying with the PE and opacity emission limitations established pursuant to OAC rule 3745-31-05(A)(3). The controls and practices that constitute BACT also meet the BAT requirements of 3745-31-05(A)(3).
- c. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) (i.e., baghouse exhausts) and for any visible emissions of fugitive dust from the egress points (i.e., enclosure openings, building windows, doors, roof monitors, etc.) from the unloading, transferring, crushing, and conveying operations associated with 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 weekly 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 minimize or eliminate abnormal visible emissions.



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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-1036, issued on April 1, 1992: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., enclosure openings, 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(s) and/or visible emissions of fugitive dust.

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))*

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

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

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

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-1036, issued on April 1, 1992: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.



f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

b. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 10 percent opacity as a six-minute average from all coal handling areas.

Applicable Compliance Method:

Compliance with the visible emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of fugitive dust monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20)*

c. Emission Limitation:

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



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Applicable Compliance Method:

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

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

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-1036, issued on April 1, 1992: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

**7. P902, Fly Ash Handling System**

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

Flyash Handling System, including pneumatic conveyors, flyash transfer bin, and flyash storage silos and controlled with filters/baghouses.

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-04790, issued 11/6/2001)  <i>Best Available Technology (BAT)</i>	PE shall not exceed 1.03 pounds per hour and 0.39 TPY.  PM <sub>10</sub> shall not exceed 0.36 pound per hour and 0.15 TPY.  See b)(2)a. through b)(2)g.  Compliance with the requirements of this rule includes compliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stacks (i.e. fabric filter dust collector outlets) serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(7)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-08(A)(1).
e.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The hourly PE and PM<sub>10</sub> emission limitations above are based upon the emissions unit's potentials to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emission limitations.
- b. Visible particulate emissions from any fugitive dust emissions point shall not exceed twenty percent (20%) opacity, as a three-minute average.
- c. The permittee shall pneumatically transfer the flyash to the storage silos. The pneumatic system shall be totally enclosed so as to prevent at all times visible emissions of fugitive dust.
- d. Each flyash storage silo shall be totally enclosed and vented to a baghouse. The enclosure shall be sufficient so as to minimize or eliminate at all times visible emissions of fugitive dust at the points of capture.
- e. All transfer points shall be totally enclosed with water sprays at the enclosure entrance.
- f. The dump truck loading operation shall be totally enclosed with water sprays at the enclosure entrance.
- g. The permittee shall water all flyash prior to dump truck loading.

c) Operational Restrictions

- (1) The permittee shall pneumatically transfer the flyash to the storage silos. The pneumatic system shall be totally enclosed so as to prevent at all times visible emissions of fugitive dust.  
*(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))*
- (2) Each flyash storage silo shall be totally enclosed and vented to a baghouse. The enclosure shall be sufficient so as to minimize or eliminate at all times visible emissions of fugitive dust at the points of capture.  
*(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))*
- (3) All transfer points shall be totally enclosed with water sprays at the enclosure entrance.  
*(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))*
- (4) The dump truck loading operation shall be totally enclosed with water sprays at the enclosure entrance.  
*(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))*



- (5) The permittee shall water all flyash prior to dump truck loading.  
*(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))*
- (6) The pressure drop across each baghouse shall be maintained within the range of 0.5 – 12 inches of water while at least one fly ash blower is in operation.  
*(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))*

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

- (1) The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse while at least one fly ash blower is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

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

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

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

- k. the name(s) of the personnel who performed the work.

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

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

- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) (i.e., baghouse exhausts) and for any visible emissions of fugitive dust from the egress points (i.e., enclosure openings, building windows, doors, roof monitors, etc.) from the fly ash conveying, storage silo, and loadout operations associated with 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 weekly 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 minimize or eliminate abnormal visible emissions.

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

- (3) The permittee shall maintain annual records of the total quantity, in tons, of flyash unloaded, transferred, and loaded through the flyash handling system and the actual PE and PM<sub>10</sub> emission rates, in tons per year.

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

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-04790, issued on November 6, 2001: d)(1) – d)(3). The monitoring and record keeping requirements

contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. all days during which any visible particulate emissions were observed from the stack(s) associated with this emissions unit;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., enclosure openings, building windows, doors, roof monitors, etc.) associated with this emissions unit;
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust;
  - d. each period of time (start time and date, and end time and date) when the pressure drop across a baghouse was outside of the acceptable range;
  - e. any period of time (start time and date, and end time and date) when at least one fly ash blower was in operation and the process emissions were not vented to a baghouse;
  - f. each incident of deviation described in “d” (above) where a prompt investigation was not conducted;
  - g. each incident of deviation described in “d” 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
  - h. each incident of deviation described in “d” 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 deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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

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

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



- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-04790, issued on November 6, 2001: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

- a. Emission Limitations:

PE shall not exceed 1.03 pounds per hour and 0.39 TPY.

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

Applicable Compliance Method:

The hourly emission limitations above reflect the potentials to emit and are based upon the maximum material handling capacities of the flyash handling system, in tons per hour, control efficiencies of the baghouses, and emission factors derived from AP-42 Section 13.2.4, including a flyash moisture content of 0.43%, as submitted by the permittee in the application for PTI 14-04790, dated 7/26/1999.

The annual emission limitations are based upon a calculated 385,000 tons of flyash generated per year, control efficiencies of the baghouses, and emission factors derived from AP-42 Section 13.2.4, including a flyash moisture content of 0.43%, as submitted by the permittee in the application for PTI 14-04790, dated 7/26/1999. The calculated annual flyash generation rate, in tons, was derived from the maximum coal usage rate of 498 tons/hour by emissions unit B006 and permittee-supplied data for the percentages of flyash generated from coal combustion as provided in the application for PTI 14-04790, dated 7/26/1999.

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

- b. Emission Limitations:

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

Visible particulate emissions from any fugitive dust emissions point shall not exceed twenty percent (20%) opacity, as a three-minute average.



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Applicable Compliance Method:

Compliance with the visible emission limitations shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(3).

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of stack and fugitive dust monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-04790, issued on November 6, 2001: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

**8. P903, Lime Handling System**

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

Lime Handling System, including barge unloading, conveyor transfer stations, belt conveyors, pneumatic conveyors, active storage silos, day storage silos and controlled with filters/baghouses

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-1036, issued 4/1/1992)  <i>Best Available Technology (BAT)</i>	PE shall not exceed 0.03 grain/dry standard cubic foot from each of the control devices serving this emissions unit.  Visible particulate emissions of fugitive dust shall not exceed 10 percent opacity, as a six-minute average from all lime handling areas.
b.	OAC rules 3745-31-11 through 20 (PTI 14-1036, issued 4/1/1992)  <i>Prevention of Significant Deterioration</i>	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stacks (i.e. fabric filter dust collector outlets) serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-07(B)(7)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-07(B)(11)(e).
e.	OAC rule 3745-17-08(B)	Located in a non-Appendix A area. Exempt, pursuant to OAC rule 3745-17-08(A)(1).



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

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), the following control measures and design requirements constitute BACT for PE from this emissions unit:
  - i. the barge unloading shall be equipped with a totally enclosed screw conveyor and bag filters at the transfer to the belt conveyor;
  - ii. all transfer stations between the barge unloading and the lime day silos of the sludge fixation process shall be totally enclosed with emissions ducted to bag-type filters;
  - iii. oversized capacity conveyors shall be utilized that are designed to operate at slow speeds with 35 degree idlers to deter dust generation, and shall be totally enclosed; and
  - iv. the emissions generated during the transfer of lime from the storage silos shall be vented to a dust collection system.
- b. The BACT requirements are also satisfied by complying with the PE and opacity emission limitations established pursuant to OAC rule 3745-31-05(A)(3). The controls and practices that constitute BACT also meet the BAT requirements of 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) (i.e., baghouse exhausts) and for any visible emissions of fugitive dust from the egress points (i.e., enclosure openings, building windows, doors, roof monitors, etc.) from the lime unloading, transfer, conveying, and storage silo operations associated with 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 weekly 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 minimize or eliminate abnormal visible emissions.

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-1036, issued on April 1, 1992: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. all days during which any visible particulate emissions were observed from the stack(s) associated with this emissions unit;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., enclosure openings, building windows, doors, roof monitors, etc.) associated with 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.

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))*



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- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-1036, issued on April 1, 1992: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

b. Emission Limitations:

Visible particulate emissions of fugitive dust shall not exceed 10 percent opacity, as a six-minute average from all lime handling areas.

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

Applicable Compliance Method:

Compliance with the visible emissions limitations above shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(3).



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No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate based upon the results of stack and fugitive dust monitoring, recordkeeping, and reporting, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rules 3745-31-11 through 20)*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-1036, issued on April 1, 1992: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



**9. Emissions Unit Group - Auxiliary Boilers: B007, B008**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B007	635 MMBtu/hr Natural Gas-Fired Auxiliary Boiler A, with fuel oil backup
B008	635 MMBtu/hr Natural Gas-Fired Auxiliary Boiler B, with fuel oil backup

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	<p>OAC rule 3745-31-05(D) June 30, 2008</p> <p>(PTI P0111498, issued 4/23/2013)</p> <p><i>Synthetic Minor Modification to avoid Prevention of Significant Deterioration and Nonattainment New Source Review</i></p>	<p>When combusting natural gas or No. 2 fuel oil:</p> <p>NOx emissions shall not exceed 39.8 TPY*;</p> <p>CO emissions shall not exceed 16.0 TPY*;</p> <p>PE shall not exceed 1.6 TPY*;</p> <p>PM<sub>10</sub> emissions shall not exceed 1.2 TPY*;</p> <p>PM<sub>2.5</sub> emissions shall not exceed 0.8 TPY*; and</p> <p>GHG emissions shall not exceed 64,941.0 tons (as carbon dioxide equivalent (CO<sub>2</sub>e) emissions) per year*.</p> <p>*as rolling, 12-month summations for emissions units B007 and B008, combined.</p> <p>See b)(2)e., b)(2)f., b)(2)g., and c)(2).</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	ORC 3704.03(T)	NOx emissions shall not exceed 0.10 lb/MMBtu.  CO emissions shall not exceed 0.04 lb/MMBtu.
c.	OAC rules 3745-31-11 through 3745-31-20 (PTI 14-1036, issued 4/1/1992)  <i>Prevention of Significant Deterioration</i>	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.  The PE, SO <sub>2</sub> , and NOx short-term (lb/MMBtu) emission limitations established pursuant to these rules for fuel oil combustion are equivalent to, or less stringent than, the emission limitations for fuel oil combustion established pursuant to OAC rule 3745-31-05(D) and ORC 3704.03(T) under PTI P0111498, issued 4/23/2013.  See b)(2)a., b)(2)b., b)(2)h., c)(4), and c)(5).
d.	OAC rule 3745-31-05(A)(3) June 30, 2008	Low NOx burners designed to comply with the emission limitations specified in b)(2)e. and b)(2)f.  See b)(2)c.
e.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , and VOC emissions from these air contaminant sources since the potential to emit is each less than 10 tons/year taking into account the federally enforceable restrictions in b)(1)a. and b)(1)c.  See b)(2)d.
f.	40 CFR Part 60, Subpart Db (40 CFR 60.40Db – 60.49Db)  <i>Standards of Performance (NSPS) for Industrial, Commercial, and Institutional Steam Generating Units</i>  [In accordance with 40 CFR 60.40Db(a), the emissions units are	The PE, opacity, SO <sub>2</sub> , and NOx emission limitations specified in this subpart are equivalent to, or less stringent than, the PE, opacity, SO <sub>2</sub> , and NOx emission limitations established pursuant to OAC rule 3745-31-05(A)(3), ORC 3704.03(T), OAC rule 3745-31-05(D), and OAC rules 3745-31-11 through 20. The permittee shall comply with all applicable emission limitations (including any less stringent



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	steam generating units with a heat input capacity more than 29 megawatts (100 million Btu per hour) for which construction, modification, or reconstruction commenced after June 19, 1984, and are subject to the emissions limitations and control measures specified in this section]	emission limitations) specified in this subpart.  See b)(2)i., b)(2)j., b)(2)k., b)(2)n., and c)(5).
g.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation specified in this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rules 3745-31-11 through 20.
h.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/MMBtu of actual heat input.  The requirements of this rule are equivalent to the requirements established under OAC rules 3745-31-11 through 3745-31-20.
i.	OAC rule 3745-18-06(A)	Fuel burning equipment is exempt from paragraphs (D), (F) and (G) of OAC rule 3745-18-06, and from OAC rules 3745-18-07 to 3745-18-94 of the Administrative Code during any calendar day in which natural gas is the only fuel burned.
j.	OAC rule 3745-18-06(D)	The SO <sub>2</sub> emission limitation for oil-fired steam generating units specified in this rule is less stringent than the SO <sub>2</sub> emission limitation for fuel oil combustion established pursuant to OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), and OAC rules 3745-31-11 through 20.
k.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 – 7575)  <i>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters</i>  [In accordance with 63.7490 and 63.7499, the emissions units are existing boilers installed before June 4, 2010 (actual installation date of	Limited–use boilers and process heaters must complete a tune-up every five years as specified in 40 CFR 63.7540. They are not subject to the emission limits in Tables 1 and 2 or 11 through 13 to this subpart, the annual tune-up or the energy assessment requirements in Table 3 to this subpart, or the operating limits in Table 4 to this subpart. 40 CFR 63.7500(c).  Pursuant to 40 CFR 63.7495(b), the permittee shall comply with this subpart



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	6/1990) designed to burn Gas 1 fuel and light liquid fuel. The emissions units meet the criteria in the definition of limited-use boiler or process heater based on an annual capacity factor of no more than 10 percent. The permittee has committed to burning No. 2 fuel oil only during periods of natural gas curtailment.]	no later than January 31, 2016, except as provided in 63.6(i).  See c)(5) and c)(6).
l.	40 CFR Part 63, Subpart A (40 CFR 63.7565)	Table 10 to 40 CFR Part 63, Subpart DDDDD – Applicability of General Provisions (Subpart A) to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.
m.	OAC rule 3745-110-03	Exempt, pursuant to OAC rule 3745-110-03(K)(9).

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), the following control measures constitute BACT for PE, opacity, SO<sub>2</sub> and NO<sub>x</sub> from this emissions unit:
  - i. Combustion of No. 2 fuel oil with a sulfur content not to exceed 0.5% by weight.
- b. The BACT requirements, as established in PSD PTI #14-1036, issued 4/1/1992, are also satisfied by complying with the PE, SO<sub>2</sub>, and NO<sub>x</sub> emission limitations established pursuant to OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), and ORC 3704.03(T).
- c. The Best Available Technology (BAT) emission limitations for PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, and VOC specified in b)(2)e., b)(2)f., and b)(2)g. below apply until U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- d. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP: PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, and VOC emission limitations specified in b)(1)a., b)(1)c., and b)(2)a.
- e. The following emission limitations shall not be exceeded when burning natural gas:



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PM<sub>10</sub> and PM<sub>2.5</sub> shall not exceed 0.002 lb/MMBtu of actual heat input.

SO<sub>2</sub> emissions shall not exceed 0.0006 lb/MMBtu of actual heat input.

NO<sub>x</sub> emissions shall not exceed 0.10 lb/MMBtu of actual heat input.

CO emissions shall not exceed 0.04 lb/MMBtu of actual heat input.

VOC emissions shall not exceed 0.006 lb/MMBtu of actual heat input.

- f. The following emission limitations shall not be exceeded when burning No. 2 fuel oil:

PM<sub>10</sub> emissions shall not exceed 0.007 lb/MMBtu of actual heat input.

PM<sub>2.5</sub> emissions shall not exceed 0.002 lb/MMBtu of actual heat input.

SO<sub>2</sub> emissions shall not exceed 0.002 lb/MMBtu of actual heat input.

NO<sub>x</sub> emissions shall not exceed 0.10 lb/MMBtu of actual heat input.

CO emissions shall not exceed 0.04 lb/MMBtu of actual heat input.

VOC emissions shall not exceed 0.002 lb/MMBtu of actual heat input.

- g. The following annual emission limitations shall not be exceeded when burning either natural gas or No. 2 fuel oil, for emissions unit B007 and B008, combined:

VOC emissions shall not exceed 2.0 TPY; and

SO<sub>2</sub> emissions shall not exceed 0.4 TPY.

- h. Except as stated in b)(2)i. below, the emission limitations specified in b)(2)e. and b)(2)f. and the opacity limitation in b)(1)c. above, shall not apply during periods of start-up and shutdown.

Start-up for this emissions unit is defined as the period not to exceed one hour, commencing with the initial firing of the emissions unit unless the permittee demonstrates to the satisfaction of the Director that a longer time period is needed.

Shutdown is defined as the one hour period commencing one-half hour before the last burner is turned off.

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), OAC rule 3745-31-05(A)(3), and OAC rules 3745-31-11 through 20)*

- i. The SO<sub>2</sub> and NO<sub>x</sub> emission limitations specified in 40 CFR Part 60, Subpart Db (0.20 lb/MMBtu and 0.10 lb/MMBtu, respectively) apply at all times, including periods of start-up, shutdown, and malfunction.



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- j. These emissions units are only fired with very low sulfur oil (less than 0.5% by weight), as defined in 40 CFR Part 60.41b. Therefore, pursuant to 40 CFR Part 60.42b(a), 60.42b(j), 60.47b(f), and the records required in d)(3) and 60.49b(r), the permittee is not required to employ a continuous emission monitoring system for the measurement of SO<sub>2</sub> emissions from the emissions units.
- k. Pursuant to 60.48b(b) and 60.48b(i), the permittee is not required to employ a continuous emission monitoring system for the measurement of NO<sub>x</sub> emissions from each emissions unit provided that:
  - i. each emissions unit is restricted to an annual capacity factor (as defined in 40 CFR Part 60.41b) of 10%, or less;
  - ii. the nitrogen content of the very low sulfur oil fired in the emissions unit does not exceed 0.3%, by weight;
  - iii. the permittee conducts a 3-hour performance test (conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, 7A, 7E, or other approved reference methods) to demonstrate compliance with the applicable NO<sub>x</sub> emission limitation after every 400 hours of emissions unit operation or once per calendar year, whichever comes first;
  - iv. the permittee maintains the following records [see d)(5) and d)(6)]:
    - (a) the calendar date for each day that the emissions unit is operated;
    - (b) the number of hours of operation for each day;
    - (c) the hourly steam load, in MMBtu; and
  - v. the permittee submits quarterly reports in accordance with the Standard Terms and Conditions of this permit [see e)(2) and e)(3)] that include the following information:
    - (a) the annual capacity factor over the previous 12 months;
    - (b) the results of any NO<sub>x</sub> emission tests required in the quarter;
    - (c) the total hours of operation during each month of the quarter; and
    - (d) the total hours of operation since the last NO<sub>x</sub> emission tests.
- l. 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



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continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rules 3745-31-11 through 20, 40 CFR Part 60, Subpart Db, 40 CFR 60.13, and 40 CFR Part 60, Appendix B)*

- m. The continuous opacity 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(A)(1), OAC rules 3745-31-11 through 20, 40 CFR Part 60, Subpart Db, 40 CFR 60.2, 40 CFR Part 60, Appendix F)*

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

c) Operational Restrictions

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

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), ORC 3704.03(T), OAC rules 3745-31-11 through 20, and OAC rule 3745-31-05(A)(3))*

- (2) The maximum annual heat input rate for emissions units B007 and B008, combined, shall not exceed 796,290 MMBtu per year, based upon a rolling, 12-month summation of the heat input rates.

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

- (3) The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable SO<sub>2</sub> emission limitations.

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), OAC rule 3745-31-11 through 20, and 40 CFR Part 60, Subpart Db)*

- (4) This emissions unit shall not be used to provide electric output to the utility power distribution system for sale. This emissions unit is to be used to provide steam during start-up and shutdown conditions, and occasionally for plant heating.

*(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rules 3745-31-11 through 20)*



- (5) Each emissions unit shall comply with a combined annual capacity factor of 10% or less for natural gas and No. 2 fuel oil. The natural gas and fuel oil combusted shall comply with a nitrogen content of 0.30 weight percent or less.

*(Authority for term: OAC rule 3745-77-07(A)(1), OAC rules 3745-31-11 through 20, 40 CFR Part 60, Subpart Db, and 40 CFR Part 63, Subpart DDDDD)*

- (6) The permittee shall comply with the applicable work practices and operating restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7500, 63.7515(d), 63.7540, and Table 3 to Subpart DDDDD	5-year tune-up requirements
63.7500(a)(3)	general duty to minimize emissions
63.7505(a)	general compliance requirements

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rules 3745-31-11 through 20, 40 CFR Part 60, Subpart Db, 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 the emissions unit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of data obtained by the continuous opacity monitoring system including the following:

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- c. hours of operation of the emissions unit and continuous opacity monitoring system;

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

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rules 3745-31-11 through 20, 40 CFR Part 60, Subpart Db, 40 CFR 60.13, and 40 CFR Part 60, Appendix B)*

- (3) For each shipment of oil received for burning in these emissions units, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content, nitrogen 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, nitrogen content, and heat content in accordance with the most recent version of the following ASTM methods: ASTM method D4294 for sulfur content; ASTM method D3431 for nitrogen content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Southwest Ohio Air Quality Agency.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), OAC rules 3745-31-11 through 20, 3745-18-04(E)(3), and 3745-18-04(I), and 40 CFR Part 60, Subpart Db)*

- (4) For each day during which the permittee burns a fuel other than natural gas or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), ORC 3704.03(T), OAC rules 3745-31-11 through 20, and OAC rule 3745-31-05(A)(3))*

- (5) The permittee also shall maintain the following records:
  - a. the calendar date for each day that the emissions unit is operated;
  - b. the number of hours of operation for the emissions unit for each day;
  - c. the hourly steam loads for the emissions unit for each day, in MMBtu/hr;
  - d. the actual monthly heat input rate for each emissions unit, in MMBtu/month;
  - e. the actual rolling, combined 12-month heat input summation in c)(2);



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- f. the hours of operation for each emissions unit since the last NOx emission test;
- g. the monthly natural gas usage rate for each emissions unit, in standard cubic feet;
- h. the monthly natural gas usage rate for emissions units B007 and B008, combined;
- i. the monthly number two fuel oil usage rate for each emissions unit, in gallons;
- j. the monthly number two fuel oil usage rate for emissions units B007 and B008, combined;
- k. the rolling, 12-month average annual capacity factor for each emissions unit, in percent;
- l. the monthly emissions of NOx, CO, PE, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, VOC, and GHG for each emissions unit, in tons [for CO, PE, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, VOC, and GHG, calculated based on the fuel-specific emission factors as outlined in f), and for NOx, calculated based on the NOx emission rate derived from the test results in f)(2)];
- m. the rolling, 12-month emissions of NOx, CO, PE, PM<sub>10</sub>, PM<sub>2.5</sub>, and GHG for emissions units B007 and B008, combined, in tons; and
- n. the date, commencement and completion times, and duration of each start-up and shutdown period for each emissions unit.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), OAC rules 3745-31-11 through 20, and 40 CFR Part 60, Subpart Db)*

- (6) The permittee shall comply with the applicable recordkeeping requirements required under 40 CFR Part 60, Subpart Db, including the following sections:

60.49b(d)	fuel usage and annual capacity factor record keeping (also see d)(3) and d)(5))
60.49b(f)	opacity record keeping (also see d)(2))
60.49b(o)	record retention requirements
60.49b(p)	daily operating records (also see d)(5))
60.49b(r)	fuel record keeping requirements (also see d)(3))

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

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



63.7525(k)	fuel use record keeping requirements
63.7540(a)(10), (12), and (13)	requirements for continuous compliance demonstration
63.7555	required overall records to be maintained
63.7560	record format and retention requirements

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

- (8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #P0111498, issued on 4/23/2013:d)(1) - d)(7). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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



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- 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 and/or emissions unit;
- viii. the date, time, and duration of any downtime\*\* of the continuous opacity monitoring system 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: OAC rule 3745-77-07(C)(1), OAC rules 3745-31-11 through 20, 40 CFR 60.13, and 40 CFR Part 60, Appendix B)*

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any rolling, 12-month average annual capacity factor values greater than 10%;
  - b. all periods of time when number two fuel oil with a sulfur content greater than 0.5%, by weight, was fired in this emissions unit;
  - c. all periods of time when number two fuel oil with a nitrogen content greater than 0.3%, by weight, was fired in this emissions unit;
  - d. all start-up and shutdown periods that exceed the durations specified in b)(2)h.;
  - e. any record which shows a deviation of the allowable SO<sub>2</sub> emission limitation based upon the calculated SO<sub>2</sub> emission rates from d)(3) above;
  - f. all exceedances of the rolling, 12-month heat input limitation in c)(2); and
  - g. all exceedances of the rolling, 12-month emission limitations for NO<sub>x</sub>, CO, PE, PM<sub>10</sub>, PM<sub>2.5</sub>, and GHG emissions.



The quarterly deviation 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), OAC rule 3745-31-05(D), OAC rules 3745-31-11 through 20, and 40 CFR Part 60, Subpart Db)*

- (3) Pursuant to 40 CFR 60.49b(q)(3), the permittee also shall submit quarterly summaries that include the following:
  - a. the results of any nitrogen oxides emission tests required in the quarter;
  - b. the total hours of operation for this emissions unit during the quarter; and
  - c. the total hours of operation for this emissions unit since the last NOx emission test.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

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

- (4) The permittee shall submit annual reports that specify the total PE, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NOx, CO and VOC emissions from each emissions unit for the previous calendar year. The reports also shall specify the combined number two fuel oil usage (in gallons) for emissions units B007 and B008 for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.

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

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

60.49b(b)	performance test reporting requirements
60.49b(h)	excess emission reports (also see e)(1) and e)(2))
60.49b(j)	SO <sub>2</sub> reports (also see e)(2))
60.49b(q)	annual capacity factor and NOx reports (also see e)(2) and e)(3))

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

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

63.7545(e)	Notification of Compliance Status requirements
63.7545(f)	Notification of natural gas curtailments



63.7550 and Table 9 to Subpart DDDDD	content and submission of compliance reports
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*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD)*

(7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #P0111498, issued on 4/23/2013: e)(1) – e)(6). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average.

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, the permittee shall demonstrate compliance with the visible particulate emission limitation above in accordance with Method 9 of 40 CFR Part 60, Appendix A.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rules 3745-31-11 through 20, and 40 CFR Part 60, Subpart Db)*

b. Emission Limitations:

When burning natural gas:

PM<sub>10</sub> and PM<sub>2.5</sub> emissions shall not exceed 0.002 lb/MMBtu of actual heat input.

When burning No. 2 fuel oil:

PM<sub>10</sub> emissions shall not exceed 0.007 lb/MMBtu of actual heat input.

PM<sub>2.5</sub> emissions shall not exceed 0.002 lb/MMBtu of actual heat input.



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When burning either natural gas and/or No. 2 fuel oil:

PE emissions shall not exceed 0.020 lb/MMBtu of actual heat input.

Applicable Compliance Methods:

When burning natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (668,421 cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs of PE/PM<sub>10</sub>/PM<sub>2.5</sub> per million cubic feet, and dividing by the maximum hourly heat input capacity of the emissions unit (635 MMBtu/hr), then dividing by one million.

When burning No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (4669 gallons/hr) by the appropriate AP-42, Fifth Edition, Section 1.3, Table 1.3-6 for industrial boilers (revised 5/10) emission factors (2, 1.00, and 0.25 lbs of PE/PM<sub>10</sub>/PM<sub>2.5</sub> per 1000 gallons of fuel, respectively), and dividing by the maximum hourly heat input capacity of the emissions unit (635 MMBtu/hr), then dividing by one thousand.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations above in accordance with the following USEPA reference methods:

For PE, Methods 1-5 of 40 CFR, Part 60, Appendix A.

For PM<sub>10</sub>/PM<sub>2.5</sub>, Methods 1-4 of 40 CFR Part 60, Appendix A, and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-10(B), OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), and OAC rules 3745-31-11 through 20)*

c. Emission Limitations:

SO<sub>2</sub> emissions shall not exceed 0.0006 lb/MMBtu of actual heat input, when burning natural gas; and

SO<sub>2</sub> emissions shall not exceed 0.002 lb/MMBtu of actual heat input, when burning No. 2 fuel oil.

Applicable Compliance Methods:

When combusting natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (668,421 cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lbs of SO<sub>2</sub> per million cubic feet, and dividing by the maximum hourly heat input capacity of the emissions unit (635 MMBtu/hr), then dividing by one million.



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Compliance with the SO<sub>2</sub> emission limitation for fuel oil shall be demonstrated by the fuel analysis and recordkeeping requirements specified in d)(3).

If required, the permittee shall demonstrate compliance with the lb SO<sub>2</sub>/MMBtu emission limitations above in accordance with USEPA reference Method 6, Method 6A, Method 6B, or Method 6C, whichever is appropriate, of 40 CFR, Part 60, Appendix A.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), OAC rules 3745-31-11 through 20, and 40 CFR Part 60, Subpart Db)*

d. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 0.10 lb/MMBtu actual heat input, when burning natural gas or No. 2 fuel oil.

Applicable Compliance Method:

The actual NO<sub>x</sub> emission rate shall be calculated from the results of the most recent stack test which demonstrated compliance. The permittee shall conduct emission testing in accordance with the requirements of 40 CFR Part 60, Subpart Db. See f)(2).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), ORC 3704.03(T), OAC rules 3745-31-11 through 20, and 40 CFR Part 60, Subpart Db)*

e. Emission Limitation:

CO emissions shall not exceed 0.04 lb/MMBtu of actual heat input, when burning natural gas or No. 2 fuel oil.

Applicable Compliance Method:

When combusting natural gas, the emission rate of 0.04 lb CO/MMBtu represents the burner vendors guaranteed emission factor as provided in the application for PTI P0111498, submitted 10/12/2012.

When combusting fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (4669 gallons/hr) by the appropriate AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 5 lbs of CO per 1000 gallons of fuel, and dividing by the maximum hourly heat input capacity of the emissions unit (635 MMBtu/hr), then dividing by one thousand.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation in accordance with Method 10, 40 CFR, Part 60, Appendix A.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), ORC 3704.03(T), OAC rules 3745-31-11 through 20)*



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f. Emission Limitations:

VOC emissions shall not exceed 0.006 lb/MMBtu of actual heat input, when burning natural gas; and

VOC emissions shall not exceed 0.002 lb of VOC/MMBtu of actual heat input, when burning No. 2 fuel oil.

Applicable Compliance Methods:

When burning natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (668,421 cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 5.5 lbs of VOC per million cubic feet, and dividing by the maximum hourly heat input capacity of the emissions unit (635 MMBtu/hr), then dividing by one million.

When burning No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (4669 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-3 (revised 5/10) emission factor of 0.252 lbs of VOC per 1000 gallons, and dividing by the maximum hourly heat input capacity of the emissions unit (635 MMBtu/hr), then dividing by one thousand.

If required, the permittee shall demonstrate compliance with the lb VOC/MMBtu limitations above in accordance with Method 25 or 25A, whichever is appropriate, in 40 CFR, Part 60, Appendix A.

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

g. Emission Limitations:

NO<sub>x</sub> emissions shall not exceed 39.8 TPY\*;

CO emissions shall not exceed 16.0 TPY\*;

PE shall not exceed 1.6 TPY\*;

PM<sub>10</sub> emissions shall not exceed 1.2 TPY\*; and

PM<sub>2.5</sub> emissions shall not exceed 0.8 TPY\*.

\*as rolling, 12-month summations for emissions units B007 and B008, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month NO<sub>x</sub>, CO, PE, PM<sub>10</sub>, and PM<sub>2.5</sub>, emission limitations shall be demonstrated based on the record keeping in d)(5).

The annual NO<sub>x</sub> emission limitation above was calculated by multiplying the short-term emission limitation of 0.10 lb NO<sub>x</sub>/MMBtu by the restricted combined



annual heat input of 796,290 MMBtu per rolling 12-month period, and dividing by 2000 pounds per ton. Compliance with the annual NOx emission limitation above is ensured if compliance is maintained with the restricted annual heat input and the NOx emission limitation of 0.10 lb/MMBtu as demonstrated by the emission testing in f)(2).

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

h. Emission Limitation:

GHG emissions shall not exceed 64,941.0 tons (as carbon dioxide equivalent (CO<sub>2</sub>e) emissions) per year as a rolling, 12 month summation, while burning natural gas or No. 2 fuel oil, for emissions units B007 and B008, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month GHG emission limitation shall be determined by the record keeping in d)(5), using the following equations to calculate monthly emissions:

GHG (CO<sub>2</sub>e) emissions = (CO<sub>2</sub>e emissions from fuel oil combustion) + (CO<sub>2</sub>e emissions from natural gas combustion), where:

CO<sub>2</sub>e emissions from fuel oil combustion in tons per month = monthly heat input from fuel oil (MMBtu/month) \* [{73.96 kg CO<sub>2</sub> per MMBtu} + (0.003 kg CH<sub>4</sub> per MMBtu) \* {(global warming potential (GWP) 21)}] + {(0.0006 kg N<sub>2</sub>O per MMBtu) \* (global warming potential (GWP) 310)} / (907.18 kg/ton)

CO<sub>2</sub>e emissions from natural gas combustion in tons per month = monthly heat input from natural gas (MMBtu/month) \* [{53.02 kg CO<sub>2</sub> per MMBtu} + (0.001 kg CH<sub>4</sub> per MMBtu) \* {(global warming potential (GWP) 21)}] + {(0.0001 kg N<sub>2</sub>O per MMBtu) \* (global warming potential (GWP) 310)} / (907.18 kg/ton)

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

i. Emission Limitations:

SO<sub>2</sub> emissions shall not exceed 0.4 TPY\*\*; and

VOC emissions shall not exceed 2.0 TPY\*\*.

\*\*for emissions units B007 and B008, combined.

Applicable Compliance Method:

Compliance with the annual SO<sub>2</sub> and VOC emission limitations shall be calculated from a summation of the monthly emissions record keeping as specified in d)(5).

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



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- (2) The permittee shall conduct, or have conducted, emission testing for each emissions unit in accordance with the following requirements and 40 CFR 60.46b(h):
- a. The NO<sub>x</sub> emission testing shall be conducted after every 400 hours of operation of each emissions unit or once per calendar year, whichever occurs first.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable NO<sub>x</sub> mass emission rate of 0.10 lb/MMBtu actual heat input.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
    - i. 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, 7A, 7E, or other approved reference methods.
    - ii. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted over a minimum of 3 consecutive emissions unit operating hours while the emissions unit is operating near its maximum heat input capacity.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), ORC 3704.03(T), OAC rules 3745-31-11 through 20, and 40 CFR Part 60, Subpart Db)*

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install



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#P0111498, issued on 4/23/2013: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.



10. Emissions Unit Group - Emergency Diesel Generators: B001, B002, B003

EU ID	Operations, Property and/or Equipment Description
B001	4801 hp Emergency Diesel Generator No. 1
B002	4801 hp Emergency Diesel Generator No. 2
B003	4801 hp Emergency Diesel Generator No. 3

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)(1)	Visible particulate emissions from the stack serving these emissions units shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(5)(b)	PE from each diesel generator shall not exceed 0.062 pound per MMBtu of actual heat content.
c.	OAC rule 3745-18-06(G)	SO <sub>2</sub> emissions from each emissions unit shall not exceed 0.5 pound per MMBtu of actual heat input.
d.	40 CFR Part 63, Subpart ZZZZ [40 CFR 63.6580-6675]  <i>National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)</i>  [In accordance with 40 CFR 63.6590 and 63.6675, this emissions unit is an existing emergency compression ignition stationary RICE >500 hp located at a major source.]	Comply with the work practices specified in b)(2)c. pursuant to Table 2c of Subpart ZZZZ. [40 CFR 63.6640]  See b)(2)a. and c)(3).
e.	40 CFR Part 63.1-15 [40 CFR 63.6665]	Table 8 to 40 CFR Part 63, Subpart ZZZZ – Applicability of General Provisions



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		(Subpart A) to Subpart ZZZZ shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.
f.	OAC rule 3745-31-05(A)(3) (PTI 18-150, issued 7/6/1982)	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall comply with the following requirements of 40 CFR Part 63, Subpart ZZZZ, Table 2c for emergency stationary compression ignition (CI) RICE:

- i. change oil and filter every 500 hours of operation or annually, whichever comes first;
- ii. inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- iii. inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

b. No applicable emission limitations or control measures were established for these emissions units in PTI 18-150.

c) Operational Restrictions

(1) The permittee shall burn only diesel fuel in each emissions unit.

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

(2) The quality of diesel fuel burned in each emissions unit shall have a sulfur content that is sufficient to comply with the allowable SO<sub>2</sub> emission limitation.

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

(3) The permittee shall comply with the applicable operating restrictions required under 40 CFR Part 63, Subpart ZZZZ, including the following sections:

63.6605(a) and (b)	general duty to minimize emissions
63.6604(b)	requirements for use of nonroad diesel fuel
63.6625(h)	requirements for startup, not to exceed 30 minutes
63.6640(f)	operating requirements for emergency stationary RICE

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

d) Monitoring and/or Recordkeeping Requirements

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

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

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

Alternative 1:

For each shipment of diesel fuel received for burning in the emissions unit, the permittee shall collect or require the diesel fuel supplier to collect a representative grab sample of diesel fuel and maintain records of the total quantity of diesel fuel received, the permittee's or diesel fuel 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 diesel fuel for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

Alternative 2:

The permittee shall collect a representative grab sample of diesel fuel that is burned in the emissions unit for each day when the emissions unit is in operation. If additional diesel fuel is added to the tank(s) serving the emissions unit, on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the diesel fuel burned in the emissions unit. A representative grab sample of diesel fuel does not need to be collected on days when the emissions unit is only operated for the purpose of "test firing." The permittee shall maintain records of the total quantity of diesel fuel 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 rule 3745-18-04(E)(3), and OAC rule 3745-18-04(I))*

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

63.6625(i)	optional engine oil analysis program requirements
63.6655(a) and (e)	required overall records to be maintained
63.6660	record format and retention requirements

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

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #18-150, issued on 7/6/1982:d)(1) - d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. Each day when a fuel other than diesel fuel was burned in each emissions unit; and
  - b. Any exceedance of the allowable pounds of SO<sub>2</sub>/MMBtu actual heat input limitation.

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) and OAC rule 3745-18-06(G))*

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

63.6630(c) and 63.6645	requirements for notification reports
63.6640(b)	submission of deviation reports
63.6650(a)	submission of compliance reports in accordance with Table 7 of Subpart ZZZZ
63.6650(c) and (h)	content of compliance reports



63.6650(f)	Title V monitoring report allowance
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(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart ZZZZ)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #18-150, issued on 7/6/1982: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

PE from each diesel generator shall not exceed 0.062 pound per MMBtu of actual heat content.

Applicable Compliance Method:

Compliance may be based upon an emission factor of 0.062 pound PE per MMBtu specified in AP-42, Fifth Edition, Chapter 3, Section 3.4, "Large Stationary Diesel Engines", Table 3.4-2, 10/96.

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

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

b. Emission Limitation:

SO<sub>2</sub> emissions from each emissions unit shall not exceed 0.5 pound per MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with the SO<sub>2</sub> emission limitation shall be demonstrated by the recordkeeping requirements specified in d)(2).

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

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



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

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.

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E), and OAC rule 3745-18-04(F)(2))*

c. Emission Limitation:

Visible particulate emissions from the stack serving each emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, when appropriate, Method 9 visible emissions observations will be required pursuant to OAC rule 3745-15-04(A).

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)(a))*

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #18-150, issued on 7/6/1982: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.