



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

May 7, 2003

**CERTIFIED MAIL**

0165000006 - Picway Plant  
0381000043 - Robert P. Mone

0616000000 - Conesville  
0627010056 - Gen J.M. Gavin

0684000000 - Muskingum River Plant  
1741050002 - Cardinal Plant

American Electric Power Company  
John McManus  
1 Riverside Plaza  
Columbus, OH 43215

RE: Draft Title IV Chapter 3745-103 permits

Dear Mr. Mc Manus:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed drafts of the Title IV permits for the facilities referenced above. The purpose of these drafts is to solicit public comments concerning the issuance of final permits. A public notice concerning each draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where each facility is located. Comments concerning these draft permits and/or requests for a public hearing must be submitted within 30 days of the date of publication in the newspaper. Comments or requests for public hearing should be submitted to :

Dana Thompson  
Ohio EPA  
Division of Air Pollution Control  
P.O. Box 1049  
Columbus, Ohio 43216-1049

You will be notified in writing if a public hearing is scheduled.

A decision on issuance of each final Title IV permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided a copy of each preliminary proposed Title IV permit and an opportunity to comment prior to submittal of the proposed Title IV permit to USEPA.

If you have any questions about these draft Title IV permits, please contact Dana Thompson at (614) 644-3701.

Sincerely,

Michael Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Cecilia Mijares, U.S. EPA Region 5  
Arthur Hofmeister, U.S. EPA Region 4  
Thomas Maslany, U.S. EPA Region 3  
Robert Miller, U.S. EPA Clean Air Markets Division  
Jim Orlemann, DAPC Engineering  
Paul Dubenetzky, Indiana Office of Air Management

Allan Elliot, Commonwealth of Kentucky Natural Resource & Environmental Protection, Div. for Air Quality  
Virginia Department of Environmental Quality, Office of Air Program Coordination  
West Virginia Division of Environmental Protection, Office of Air Quality

**American Electric Power**  
1 Riverside Plaza  
Columbus OH 43215 2373  
614 223 1000



**Mr. Charles Branch**  
**Acid Rain Program Manager**  
**Ohio Environmental Protection Agency**  
**Lazarus Government Center**  
**P.O. Box 1049**  
**Columbus, OH 43216-1049**

**April 14, 2000**

**RE: ACID RAIN – PHASE II PERMIT APPLICATION**

**Dear Sir/Madam:**

**Please find enclosed the original and one copy of a Phase II Permit Application for the Robert P. Mone Plant.**

**If you have any questions regarding this information, please call me at (614) 223-1268.**

**Sincerely,**

A handwritten signature in black ink that reads 'John M. McManus'.

**John M. McManus**  
**Environmental Strategy and Planning**

**JMM0414200/slb**

Bcc w/encl  
R. R. D'Auteuil  
Kemp  
R. Robida  
A. Gray/M **V** Runyon



# Phase II Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31

This submission is:  New  Revised

**STEP 1**  
Identify the source by plant name, State, and ORIS code.

Plant Name	Robert P. Mone	State	OH	ORIS Code	7872
------------	----------------	-------	----	-----------	------

### Compliance Plan

a	b		c	d	e
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)		Repowering Plan	New Units Commence Operation Date	New Units Monitor Certification Deadline

**STEP 2**  
Enter the unit ID# for each affected unit, and indicate whether a unit is being repowered and the repowering plan being renewed by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e.

a	b	c	d	e
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	Repowering Plan	New Units Commence Operation Date	New Units Monitor Certification Deadline
1	Yes	NO	April 15, 2002	Sept. 1, 2002
2	Yes	NO	April 15, 2002	Sept. 1, 2002
3	Yes	NO	April 15, 2002	Sept. 1, 2002
	Yes			

**STEP 3**  
Check the box if the response in column c of Step 2 is "Yes" for any unit.

For each unit that is being repowered, the Repowering Extension Plan form is included.

Plant Name (from Step 1) <b>Robert P. Mone</b>
--

**STEP 4**  
Read the standard requirements and certification, enter the name of the designated representative, and sign and date

#### Standard Requirements

##### Permit Requirements.

- (1) The designated representative of each affected source and each affected unit at the source shall:
  - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
  - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
  - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
  - (ii) Have an Acid Rain Permit.

##### Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

##### Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each affected unit at the source shall:
  - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
  - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
  - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
  - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7, 72.8, or 72.14 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

##### Excess Emissions Requirements.

- (1) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected unit that has excess emissions in any calendar year shall:
  - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
  - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

##### Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
  - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
  - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
  - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
  - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Plant Name (from Step 1) <b>Robert P. Mone</b>
--

Liability.

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7, 72.8, or 72.14, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO<sub>x</sub> averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7, 72.8, or 72.14 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	John M. McManus	
Signature	John M. McManus	Date 4/14/00



---

**TITLE IV ACID RAIN PERMIT - DRAFT PERMIT**

Effective Date:

Facility ID: 0381000043 P001

Expiration Date

SIC Code: 4931 ORIS Code: 7872

This document constitutes issuance for:

**ROBERT P. MONE, 4406 Mentzer Road, Convoy, Ohio 45832-9581**

of a Title IV Acid Rain Permit for:

Unit #1

**General Terms & Conditions****1 Statement of Basis**

In accordance with Ohio Revised Code Section 3704 and Titles IV and V of the Clean Air Act, the Ohio Environmental Protection Agency issues this permit pursuant to Ohio Administrative Code Chapters 3745-103 and 3745-77.

**2. Sulfur Dioxide (SO<sub>2</sub>) Allowance Allocations**

Sulfur dioxide (SO<sub>2</sub>) emissions limitations for affected units in the Acid Rain Program are denoted in allowances, which represents tons of SO<sub>2</sub>. Within the Title IV Acid Rain Permit, the number of allowances by U.S. EPA to specific affected units are indicated in the below SO<sub>2</sub> Allowance Allocation Table.

SO <sub>2</sub> ALLOWANCE ALLOCATION						
YEAR		2003	2004	2005	2006	2007
UNIT #CTG4	SO <sub>2</sub> Allowances under Table 2 of 40 CFR Section 73.10	NA	NA	NA	NA	NA

## **Draft Title IV Acid Rain Permit for ROBERT P. MONE**

The number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. This situation does not necessitate a revision to the unit SO<sub>2</sub> allowance allocations identified in this permit (See 40 CFR 72.84).

### **3. Nitrogen Oxides (NO<sub>x</sub>) Requirements**

The requirements in this permit are designed to meet Title IV of the Clean Air Act and the corresponding regulations of U.S. EPA and Ohio EPA. This source is also required to meet any applicable requirements of 3745-14-01 through 3745-14-11 of the Ohio Administrative Code.

### **4. Comments, Notes, and Justifications**

This section contains any statements of factual, legal, and policy considerations used in the issuance of this final Title IV Acid Rain Permit.

Unit not in the NADB, commenced operation after the U.S. EPA's final Table of units were established, therefore this unit has no established allowances at this time.

### **5. Permit Application**

Attached as part of this permit is the permittee's Title IV Acid Rain Permit application. The application contains additional conditions, terms and limitations that must be met and that are a part of this permit. The application identifies the affected source, affected units, and specifies standard requirements (Permit Requirements, Monitoring Requirements, Sulfur Dioxide Requirements, Nitrogen Oxides Requirements, Excess Emissions Requirements, Record keeping and Reporting Requirements, Liability, and Effect on Other Authorities).

**ATTACHED.**

## **Draft Title IV Acid Rain Permit for ROBERT P. MONE**

### **6. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received. If you are not contacted, please contact:

Ohio EPA, DAPC  
Title IV Permit Writer  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614) 644-2270

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

---

Director



---

**TITLE IV ACID RAIN PERMIT - DRAFT PERMIT**

Effective Date

Facility ID: 0381000043 P002

Expiration Date:

SIC Code: 4931 ORIS Code: 7872

This document constitutes issuance for

ROBERT P. MONE, 4406 Mentzer Road, Convoy, Ohio 45832-9581

of a Title IV Acid Rain Permit for

Unit #2

**General Terms & Conditions****1 Statement of Basis**

In accordance with Ohio Revised Code Section 3704 and Titles IV and V of the Clean Air Act, the Ohio Environmental Protection Agency issues this permit pursuant to Ohio Administrative Code Chapters 3745-103 and 3745-77.

**2. Sulfur Dioxide (SO<sub>2</sub>) Allowance Allocations**

Sulfur dioxide (SO<sub>2</sub>) emissions limitations for affected units in the Acid Rain Program are denoted in allowances, which represents tons of SO<sub>2</sub>. Within the Title IV Acid Rain Permit, the number of allowances by U.S. EPA to specific affected units are indicated in the below SO<sub>2</sub> Allowance Allocation Table.

SO <sub>2</sub> ALLOWANCE ALLOCATION						
YEAR		2003	2004	2005	2006	2007
UNIT #2	SO <sub>2</sub> Allowances under Table 2 of 40 CFR Section 73.10	NA	NA	NA	NA	NA

## **Draft Title IV Acid Rain Permit for ROBERT P. MONE**

The number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. This situation does not necessitate a revision to the unit SO<sub>2</sub> allowance allocations identified in this permit (See 40 CFR 72.84).

### **3. Nitrogen Oxides (NO<sub>x</sub>) Requirements**

The requirements in this permit are designed to meet Title IV of the Clean Air Act and the corresponding regulations of U.S. EPA and Ohio EPA. This source is also required to meet any applicable requirements of 3745-14-01 through 3745-14-11 of the Ohio Administrative Code.

### **4. Comments, Notes, and Justifications**

This section contains any statements of factual, legal, and policy considerations used in the issuance of this final Title IV Acid Rain Permit.

Unit not in the NADB, commenced operation after the U.S. EPA's final Table of units were established, therefore this unit has no established allowances at this time.

### **5. Permit Application**

Attached as part of this permit is the permittee's Title IV Acid Rain Permit application. The application contains additional conditions, terms and limitations that must be met and that are a part of this permit. The application identifies the affected source, affected units, and specifies standard requirements (Permit Requirements, Monitoring Requirements, Sulfur Dioxide Requirements, Nitrogen Oxides Requirements, Excess Emissions Requirements, Record keeping and Reporting Requirements, Liability, and Effect on Other Authorities).

**ATTACHED.**

## **Draft Title IV Acid Rain Permit for ROBERT P. MONE**

### **6. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received. If you are not contacted, please contact:

Ohio EPA, DAPC  
Title IV Permit Writer  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614) 644-2270

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

---

Director



---

**TITLE IV ACID RAIN PERMIT - DRAFT PERMIT**

Effective Date:

Facility ID: 0381000043 P003

Expiration Date:

SIC Code: 4931 ORIS Code: 7872

This document constitutes issuance for

**ROBERT P. MONE, 4406 Mentzer Road, Convoy, Ohio 45832-9581**

of a Title IV Acid Rain Permit for:

Unit #3

**General Terms & Conditions****1. Statement of Basis**

In accordance with Ohio Revised Code Section 3704 and Titles IV and V of the Clean Air Act, the Ohio Environmental Protection Agency issues this permit pursuant to Ohio Administrative Code Chapters 3745-103 and 3745-77.

**2. Sulfur Dioxide (SO<sub>2</sub>) Allowance Allocations**

Sulfur dioxide (SO<sub>2</sub>) emissions limitations for affected units in the Acid Rain Program are denoted in allowances, which represents tons of SO<sub>2</sub>. Within the Title IV Acid Rain Permit, the number of allowances by U.S. EPA to specific affected units are indicated in the below SO<sub>2</sub> Allowance Allocation Table.

SO <sub>2</sub> ALLOWANCE ALLOCATION						
YEAR		2003	2004	2005	2006	2007
UNIT #3	SO <sub>2</sub> Allowances under Table 2 of 40 CFR Section 73.10	NA	NA	NA	NA	NA

## **Draft Title IV Acid Rain Permit for ROBERT P. MONE**

The number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. This situation does not necessitate a revision to the unit SO<sub>2</sub> allowance allocations identified in this permit (See 40 CFR 72.84).

### **3. Nitrogen Oxides (NO<sub>x</sub>) Requirements**

The requirements in this permit are designed to meet Title IV of the Clean Air Act and the corresponding regulations of U.S. EPA and Ohio EPA. This source is also required to meet any applicable requirements of 3745-14-01 through 3745-14-11 of the Ohio Administrative Code.

### **4. Comments, Notes, and Justifications**

This section contains any statements of factual, legal, and policy considerations used in the issuance of this final Title IV Acid Rain Permit.

Unit not in the NADB, commenced operation after the U.S. EPA's final Table of units were established, therefore this unit has no established allowances at this time.

### **5. Permit Application**

Attached as part of this permit is the permittee's Title IV Acid Rain Permit application. The application contains additional conditions, terms and limitations that must be met and that are a part of this permit. The application identifies the affected source, affected units, and specifies standard requirements (Permit Requirements, Monitoring Requirements, Sulfur Dioxide Requirements, Nitrogen Oxides Requirements, Excess Emissions Requirements, Record keeping and Reporting Requirements, Liability, and Effect on Other Authorities).

**ATTACHED.**

## **Draft Title IV Acid Rain Permit for ROBERT P. MONE**

### **6. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received. If you are not contacted, please contact:

Ohio EPA, DAPC  
Title IV Permit Writer  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614) 644-2270

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

---

Director