



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

10/8/2009

**Certified Mail**

Randy Meyer  
American Municipal Power Gen. Station  
2600 Airport Drive  
Columbus, OH 43219

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0653000069  
Permit Number: P0104461  
Permit Type: Administrative Modification  
County: Meigs

No	TOXIC REVIEW
Yes	PSD
No	SYNTHETIC MINOR
Yes	CEMS
Yes	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc>.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Ohio EPA DAPC, Southeast District Office

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director



  
Division of Air Pollution Control

**Response to Comments**  
**Draft Administrative Modification to American Municipal Power air permit**  
**number P0104461**

**Agency Contact for this Package**

Division Contact: Dean Ponchak, DAPC, 740-380-5297, [dean.ponchak@epa.state.oh.us](mailto:dean.ponchak@epa.state.oh.us)

Public Involvement Coordinator: Jed Thorp, 614-644-2160, [jed.thorp@epa.state.oh.us](mailto:jed.thorp@epa.state.oh.us)

Ohio EPA held a public hearing on June 2, 2009 regarding a draft administrative modification issued to American Municipal Power (AMP.) This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on June 10, 2009.

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.

**General/Overall Concerns**

- Comment #1**      Comments were received which implied that Ohio EPA did not conduct a proper Maximum Achievable Control Technology (MACT) analysis and simply accepted previous voluntary restrictions as MACT.
- Response #1**      The analysis conducted followed Ohio's case-by-case MACT requirements found in Ohio Administrative Code (OAC) 3745-31-28. This analysis included research into similar sources, an analysis of what emission limits have been achieved in practice, and an analysis of the cost-effectiveness of additional levels of control. As documented on Ohio EPA's online repository for the AMP project, Ohio EPA spent a great deal of time and resources researching facts in order to determine the validity of AMP's claim of the Best Controlled Similar Source (BCSS) and controls go beyond the BCSS. Upon identification of the best control on similar sources, Ohio EPA worked with AMP to determine the strictest emission levels that could be achieved in practice on an ongoing basis. Based on this analysis, Ohio EPA believes that case-by-case MACT has been met. More extensive documentation of the appropriate case-by-case MACT determination was provided to Ohio EPA by AMP during the comment review period, which has lead to lower HAPs emissions limits, additional control equipment and improved monitoring in the final permit to install.

The information repository is located at the following web address:  
<http://www.epa.ohio.gov/pic/ampohio.aspx>

- Comment #2** Comments were received stating that the emissions limits in the permit did not reflect Hazardous Air Pollutants (HAP) emissions by the BCSS.
- Response #2** As described in the response to Comment #1, a great deal of research and analysis has occurred. During this research, Ohio EPA identified slightly lower tested emissions rates on potential BCSS sources which we believe did not reflect a practical limit that could be complied with on an ongoing basis. Some of the reasons these slightly lower emissions limits were rejected included: some units tested in question were substantively smaller than AMP's proposed project and so, therefore, were not considered similar sources, some units reviewed were for units that were utilizing 100% sub-bituminous coals and again were not considered similar sources, some support information for tests was unavailable so the validity of the test data was not known, and some tests consisted of just one three-hour test for which Ohio EPA could not determine if the emission levels could be achieved on an ongoing basis. Based upon Ohio EPA's experience and judgment, the limits set forth in the permit are the strictest emissions limits practically possible.
- Comment #3** Comments were received that questioned the validity of characterizing this permit action as an "Administrative Modification".
- Response #3** When a change is proposed for either an existing permit or emissions unit, Ohio EPA must determine what type of permit action is needed to effect the proposed change. This particular permit is simply for a re-evaluation of the allowed emissions limits for HAPs caused by a change in the rules since the original permit was issued. There is no physical change or change in the method of operation associated with this change. Therefore, the proposed change to the permit did not meet the definition of "Major modification" (OAC rule 3745-31-01(JJJ)), nor does it meet the definition of "Modify or modification" (OAC rule 3745-31-01(QQQ)). Since an "administrative modification" is defined in OAC rule 3745-31-01(F) as "a change to a permit to install or a PTIO that does not meet the definition of a modification under this rule", this permit action **must** be identified as an administrative modification by rule.
- Note that even though the permit has been identified as an administrative modification, this designation does not change the process followed for the permit. The permit modification was still issued as a draft permit, a public hearing was held to gather interested party comments and all comments were considered before a final decision was made. These steps are all the same in this case whether the permit was issued as an administrative modification or not.
- Comment #4** Comments were received that Ohio EPA did not properly evaluate the cost of activated carbon injection as part of MACT level control.
- Response #4** A cost summary was submitted by AMP that evaluated the cost for the installation of the activated carbon injection system. The summary's conclusion was that it was not cost-effective for AMP to install controls. Even so, after

further consultation with suppliers, AMP proposed and will be required to install sorbent injection/ACI to provide added mercury reduction capability, as reflected by the final permit.

The cost summary can be view at Ohio EPA's online information repository. The information repository is located at the following web address:  
<http://www.epa.ohio.gov/pic/ampohio.aspx>

**Comment #5** Comments were received that Ohio EPA did not evaluate a proper "beyond the MACT floor" analysis when approving the modification permit.

**Response #5** Please see the response to Comment #1.

**Comment #6** Comments were received asking Ohio EPA to specify all of the HAP emissions that could potentially be emitted from the AMP plant, without using "surrogate" pollutants in lieu of direct limits.

**Response #6** The AMP permit case-by-case MACT determination ensures that all HAPs are regulated and controlled through the best means possible. Ohio and U. S. EPA support a "surrogate" approach which does limit types of HAPs, based on experience with criteria pollutant monitoring and controls. The list of HAPs that may be emitted from this facility can be found in the AMP permit application. A complete list of regulated HAPs (wheather or not emitted by this facility) may be viewed at: <http://www.epa.gov/ttn/atw/188polls.html>

**Comment #7** Comments were received alleging that Ohio EPA did not attempt to evaluate the air quality impacts due to HAP emissions and concerns were expressed about the area's future with regard to HAPs emissions from the AMP plant.

**Response #7** Modeling was not required for the administrative modification because modeling was performed for all air toxics (including HAPs) emitted over 1 ton per year potentially in the original permit. The impacts were all below levels generally accepted to protect public health.

**Comment #8** Comments were received regarding how air pollution adversely impacts human growth and development.

**Response #8** Air pollution in high enough concentrations can have adverse impacts on human health and the environment. These effects can range from mild irritation to the contribution and / or initiation of disease, both cancer and non-cancer. Certain pollutants can also impact reproduction, human growth, and neurological development. The permitting process evaluates and limits harmful air pollutants by either measuring or using computer models to estimate the concentrations that will be present in the air surrounding a new or modified facility. These concentrations are compared, or "screened" against known safe-level concentrations to ensure that no unacceptable additional risk is allowed to the public. The safe-level concentrations are provided by national and international

scientific bodies, including U.S. EPA. Based on all of this review, Ohio EPA expects no adverse impacts on human growth and development due to the emissions from this facility.

**Comment #9** Comments were received asking “how will Meigs County be in attainment” and a request for the definition of attainment.

**Response #9** This permit is being modified in order to implement the MACT requirements. The MACT rules and program are designed to control HAPs. Ohio EPA operates other parts of our program that regulate what are called “criteria” pollutants like particulate, sulfur dioxide, ozone, carbon monoxide, nitrogen oxides and lead. Under the Clean Air Act (CAA), criteria pollutants are regulated through a program that establishes ambient air attainment levels. The criteria pollutants have attainment / non attainment designations; the MACT program does not.

In the original permit issued to AMP for this facility, all of the analysis for the criteria pollutants was completed and it was determined that all applicable rules and requirements were met. This means that the expected emissions of criteria pollutants are not expected to cause non attainment nor significantly contribute to non attainment in any area. Based on this analysis, Ohio EPA believes the permit will be protective of public health.

This particular permit does not alter the emissions limits for the criteria pollutants and, instead, is simply establishing case-by-case MACT requirements because of a rule change that occurred after the first permit was issued.

**Comment #10** Comments were received requesting that Ohio EPA extend the public comment period.

**Response #10** Ohio EPA considers the interested party comment process to be a very important part of the permit process. We strive to make sure any interested party of the permits that we issue have been given an opportunity to provide their ideas and to express any concerns they may have. As in most permits like this permit, we use multiple methods to try to inform and to provide interested parties with the opportunity to provide comments. For this permit, these methods included: (1) notification in the local paper of the receipt of the application, (2) posting of the application on the web site for easy access, (3) issuance of one or more press releases to discuss the permit, (4) e-mail notification of various activities associated with this permit to e-mail list of people who have asked to be informed of air pollution permit activities in the Meigs County area, (5) issuance of the draft permit for comment, (6) holding a public information session and hearing to gather interested party comments, (7) providing staff available by phone, e-mail and mail to answer any questions, and (8) extending the comment period to allow for more comments. From the date that the receipt of the application was first published in February 2009, to the date the final comment period closed (June 10, 2009), interested parties were given close to five months to provide any input they may have.

This permit modification was also limited in scope because the only change had to do with the applicability of the case-by-case MACT rule.

Due to the limited permit revisions and the fact that interested parties were given ample opportunity to provide comments, Ohio EPA determined that it was not necessary to extend the comment period for additional public comment.

**Comment #11** Comments were received which stated that Ohio EPA should rely upon monitoring data instead of ambient air quality modeling data.

**Response #11** The modeling data submitted to Ohio EPA by AMP was reviewed and confirmed to be correct by Ohio EPA. The use of ambient air quality modeling data follows U.S. EPA approved methods and is the standard method used for these types of projects. The modeled impacts reflect the maximum allowable emission rates. Computer generated receptors are used in modeling to predict what concentration would be measured at that point if a monitor were placed there. Modeling tends to be conservative and over predicts the impacts to be protective of human health. None of the predicted maximum concentrations exceed the National Ambient Air Quality Standards (NAAQS).

**Comment #12** Comments were received indicating that Ohio EPA's modeling does not examine localized peak impacts.

**Response #12** All toxics (including HAPs) with a potential emission rate over 1 ton/year were modeled for peak concentrations. A one hour maximum concentration was calculated, by the model, for all toxics. All modeled toxics had a maximum predicted impact less than the respective maximum allowable ground level concentrations (MAGLC). Peak concentrations are a worst case projection of emissions at any one singular point at any time. Peak concentrations are estimated using worst case climatic conditions coupled with worst case pollutant concentrations.

**Comment #13** Comments were received indicating that Ohio EPA should not issue the final modification permit due to mining subsidence of Ohio's residences.

**Response #13** In Ohio, mining activities are primarily regulated by the Ohio Department of Natural Resources, Division of Mineral Resources Management (ODNR-DMRM). Potential impacts from mining activities are taken into consideration by ODNR-DMRM when deciding whether to issue or deny mining permits. Ohio EPA does not have the authority to take such concerns into consideration when making decisions about air permits. Ohio EPA also does not have the authority to dictate what type of fuel or power source will be used by electric generating plants in Ohio.

**Comment #14** Comments were received expressing concern about additional manganese emissions in this area.

**Response #14** Ohio EPA has spent many hours working in conjunction with the Agency for Toxic Substances and Disease Registry (ATSDR), U.S. EPA and other agencies to investigate manganese emissions from various facilities at various locations throughout Ohio. These investigations include air dispersion modeling, ambient air sampling, and exposure assessments. The results of these investigations are used to determine if a public health hazard exists.

The AMP proposed facility will also release some manganese. As reflected in Response #12, air dispersion modeling was conducted to predict the maximum expected downwind concentrations of manganese. Based on this analysis, we believe that the manganese emissions from this facility will not significantly add to the current concentrations and will not be significant enough to cause adverse health effects.

**Comment #15** Comments were received expressing that Meigs County is already overburdened by HAP emissions.

**Response #15** Air dispersion modeling indicates that the maximum concentrations of HAPs are not expected to be significant enough to cause adverse health effects to citizens in the area of the proposed plant. Ohio EPA examines the potential maximum air toxic impact of the proposed facility on the surrounding air and environmental quality. As described above, no unacceptable incremental impacts are attributable to the environment from this facility. Meigs County is not overburdened by air toxic emissions as determined by Ohio EPA. Although any new source of air emissions contributes to ambient air concentrations of pollutants, very small incremental increases in emissions are not expected to adversely impact human health in the area. See Response #12 and Response #14.

**Comment #16** Comments expressed that AMP will emit more Mercury than other plants, such as Gavin emitting over 1000 pounds per year, leading to higher amounts in Ohio River water and fish. Fish are potentially poisoned at 1/70<sup>th</sup> of a teaspoon of Mercury in a pond. The EPA has already recommended limiting consumption of fish due to concerns about mercury poisoning. Studies have shown that mothers who were asymptomatic or showed only mild toxic effects of mercury poisoning have sometimes given birth to severely affected infants.

**Response #16** The human health water quality criterion for mercury for the Ohio River is 0.012 micrograms of mercury per liter. To put this number into perspective, a speck of dust is estimated to weigh one microgram. Therefore, the human health water quality criterion would be the equivalent of a speck of dust in 22 gallons of water. This criterion is protective of a pregnant woman and her fetus who would be consuming two fish meals per month from the Ohio River as well as drinking 2

liters of water per day containing mercury at the level of the human health criterion. Even if the human health water quality criterion for mercury were exceeded, it wouldn't render the fish inedible for human consumption. It would mean that someone who was consuming two fish meals per month from the Ohio River and drinking 2 liters per day of water containing those levels of mercury would be exceeding the level of mercury considered to have no effect on human health. Currently, the average concentration of mercury in the Ohio River is 0.0019 micrograms per liter, and is expected to remain unchanged by discharge from the plant. That is the equivalent of 1 speck of dust in 140 gallons of water, and would be considerably more protective than the human health water quality criterion described.

**End of Response to Comments**





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**FINAL**

**Air Pollution Permit-to-Install  
for  
American Municipal Power Gen. Station**

Facility ID: 0653000069  
Permit Number: P0104461  
Permit Type: Administrative Modification  
Issued: 10/8/2009  
Initially Permitted Effective Date: 02/7/2008  
Subsequent Modification Effective Date: 10/8/2009 (date of issuance)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
for  
American Municipal Power Gen. Station

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**

**Permit Number:** P0104461

**Facility ID:** 0653000069

**Subsequent Modification Effective Date:** 10/8/2009

## Authorization

Facility ID: 0653000069

Facility Description: Power Generating Station.

Application Number(s): M0000373

Permit Number: P0104461

Permit Description: This permit is an administrative modification to permit-to-install number 06-08138 initially issued February 7, 2008 in order to add case-by-case Maximum Achievable Control Technology (MACT) requirements (per OAC rule 3745-31-28) to emission units B001 and B002. Case-by-case MACT became applicable to B001 and B002 after the permit was initially issued. This permit being subsequently modified is currently an action of the director under appeal.

Permit Type: Administrative Modification

Permit Fee: \$9,000.00

Initially Permitted Effective Date: 02/7/2008 (PTI 06-08138)

Subsequent Modification Effective Date: 10/8/2009 (date of issuance)

This document constitutes issuance to:

American Municipal Power Gen. Station  
State Route 124  
Racine, OH 45771

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0104461  
Permit Description: This permit is an administrative modification to permit-to-install number 06-08138 initially issued February 7, 2008 in order to add case-by-case Maximum Achievable Control Technology (MACT) requirements (per OAC rule 3745-31-28) to emission units B001 and B002. Case-by-case MACT became applicable to B001 and B002 after the permit was initially issued. This permit being subsequently modified is currently an action of the director under appeal.

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

Group Name:	Utility boilers	
<b>Emissions Unit ID:</b>	<b>B001</b>	
Company Equipment ID:	B001	
Superseded Permit Number:	06-08138	
General Permit Category and Type:	Not Applicable	
<b>Emissions Unit ID:</b>	<b>B002</b>	
Company Equipment ID:	B002	
Superseded Permit Number:	06-08138	
General Permit Category and Type:	Not Applicable	



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**

**Permit Number:** P0104461

**Facility ID:** 0653000069

**Subsequent Modification Effective Date:** 10/8/2009

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



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

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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



(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

**12. Permit-To-Operate Application**

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

**13. Construction Compliance Certification**

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

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

**14. Public Disclosure**

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**

**Permit Number:** P0104461

**Facility ID:** 0653000069

**Subsequent Modification Effective Date:** 10/8/2009

**17. Permit Transfers**

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

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

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



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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) Construction and/or operation of any portion of this facility shall not commence until all required permits/written authorizations for that portion of the facility are received from Ohio EPA. Authorizations for that portion of the facility must be received at a minimum from the Division of Solid and Infectious Waste Management, Division of Surface Water, and/or Division of Hazardous Waste Management as may be required for that portion of the facility.
2. Nitrogen Oxides (NOx) Budget Trading Program - OAC Chapter 3745-14
  - a) Facility Code - 0653000069
  - b) The following regulated emissions units are subject to the applicable requirements specified in OAC Chapter 3745-14 pursuant to OAC rule 3745-14-01(C)(1)(a):
    - (1) B001 - 5,191 million Btu/hour pulverized coal-fired boiler; and
    - (2) B002 - 5,191 million Btu/hour pulverized coal-fired boiler.

Note: Ohio EPA DAPC has completed draft rule amendments for OAC Chapter 3745-14, specifically OAC rule 3745-14-01 and OAC rule 3745-14-06, to facilitate the transition of the affected units from OAC Chapter 3745-14 into the federal Clean Air Interstate Rule (CAIR) program and to begin the process of “sunsetting” the parts of OAC Chapter 3745-14 which will no longer be needed as a result of Ohio’s CAIR rules (OAC Chapter 3745-109). Revising the applicability section of OAC Chapter 3745-14 will allow the rules to remain available as a backup until court required revisions to the federal CAIR program have been completed. The revision to OAC rule 3745-14-01(C)(2)(a) will require all affected units to be subject to and meet the requirements of Ohio’s CAIR program beginning in 2009. Should USEPA eliminate or suspend the CAIR program, this revision would require these units to revert back and meet the requirements of OAC Chapter 3745-14, provided a NOx allowance tracking system is maintained by USEPA.

3. Accidental Release Prevention Requirements – OAC Chapter 3745-104

This facility may be required to develop and register a risk management plan pursuant to Section 112(r) of the Clean Air Act Amendments of 1990 and may be required to comply with the requirements of Section 112(r) and the regulations adopted thereunder. The facility shall determine the applicability of Section 112(r) before commencing operation.
4. Clean Air Mercury Rule - OAC Chapter 3745-108

The permittee shall ensure that any mercury budget unit complies with the requirements of OAC Chapter 3745-108, which includes submitting timely permit applications. The requirements of this rule will be specified in the Title V permit issued to this facility.
5. Clean Air Interstate Rule - OAC Chapter 3745-109

The permittee shall ensure that any CAIR NOx, SO2, or NOx ozone season units complies with the requirements of OAC Chapter 3745-109, which includes submitting timely permit applications. The requirements of this rule will be specified in the Title V permit issued to this facility.



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6. Acid Rain Permits and Compliance - OAC Chapter 3745-103

The permittee shall ensure that any affected unit complies with the requirements of OAC Chapter 3745-103, which includes submitting timely permit applications. Emissions exceeding any allowances that are lawfully held pursuant to this rule are prohibited. The requirements of this rule will be specified in the Title V permit issued to this facility.



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



**1. Emissions Unit Group - Utility boilers: B001, B002,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B001	Boiler 1 - 5,191 million Btu/hour pulverized coal-fired boiler controlled with selective catalytic reduction(SCR), good combustion practices, sorbent injection/activated carbon injection (ACI), baghouse, wet flue gas desulfurization(FGD) and wet electrostatic precipitator(WESP)
B002	Boiler 2 - 5,191 million Btu/hour pulverized coal-fired boiler controlled with selective catalytic reduction(SCR), good combustion practices, sorbent injection/activated carbon injection (ACI), baghouse, wet flue gas desulfurization(FGD) and wet electrostatic precipitator(WESP)

- 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 operations(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. 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)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 20, 40 CFR Part 60 Subpart Da and OAC Chapter 3745-14.
b.	OAC rules 3745-31-10 through 20	<p>Particulate matter less than ten microns (PM-10) emissions (filterable only) shall not exceed 0.012 pound per million Btu heat input (as a 3-hour average).</p> <p>PM-10 (filterable and condensible) emissions shall not exceed: 0.024 pound per million Btu heat input(as a 3-hour average); 125 pounds per hour(as a 3-hour average); and 546 tons per rolling,12-month period.</p> <p>Sulfur dioxide(SO<sub>2</sub>) emissions shall not exceed: 0.24 pound per million Btu heat input(as a 3-hour average), 1,246 pounds per hour(as a 3-hour</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>average),            0.184 pound per million Btu heat input(as a 24-hour rolling average),            0.15 pound per million Btu heat input(as a 30-day rolling average); and            3,410 tons per rolling,12-month period.</p> <p>Nitrogen oxides(NOx) emissions shall not exceed:            0.10 pound per million Btu heat input(as a 24-hour rolling average),            519 pounds per hour(as a 24-hour average),            0.07 pound per million Btu heat input(as a 30-day rolling average); and            1,592 tons per rolling,12-month period.</p> <p>Carbon monoxide(CO) emissions shall not exceed:            0.150 pound per million Btu heat input(as a 3-hour average),            779 pounds per hour(as a 3-hour average); and            3,410 tons per rolling,12-month period.</p> <p>Volatile organic compound(VOC) emissions shall not exceed:            0.0037 pound per million Btu heat input(as a 3-hour average);            19.2 pounds per hour(as a 3-hour average); and            83.2 tons per rolling,12-month period.</p> <p>Lead(Pb) emissions shall not exceed:            0.00000982 pound per million Btu heat input(as a 3-hour average);            0.051 pound per hour(as a 3-hour average); and            0.22 tons per rolling,12-month period.</p> <p>Sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) emissions shall not exceed 0.0075 pound per million Btu heat input(as a 3-hour average);            38.9 pounds per hour(as a 3-hour average); and            170.5 tons per rolling,12-month period.</p> <p>See b)(2)b.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 60, Subpart Da	<p>No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility any gases which exhibit greater than 20 percent opacity (as a 6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.</p> <p>The particulate matter emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.</p> <p>The SO<sub>2</sub> emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.</p> <p>The NO<sub>x</sub> emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.</p>
d.	OAC rule 3745-17-10	The particulate emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.
e.	OAC rule 3745-17-07	The visible particulate emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart Da.
f.	OAC rule 3745-18-59	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.
g.	OAC rule 3745-21-08	The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available control technology requirements established pursuant to OAC rules 3745-31-10 through 20 in this permit to install.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the state regulations. This rule revision was submitted to U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.</p>
h.	OAC Chapter 3745-14	See Section B.2 above.
i.	OAC rule 3745-31-28 (112(g)(2)(B) case-by-case MACT)	<p>Mercury (Hg) emissions shall not exceed 1.4 pounds per trillion Btu heat input as a 12-month rolling average and 63.7 pounds per rolling, 12-month period.</p> <p>Hydrogen Fluoride (HF) emissions (directly and as a surrogate for inorganic HAPs) shall not exceed 0.0004 pounds per million Btu heat input (as a 3-hour average) and 9.09 tons per rolling, 12-month period.</p> <p>Hydrogen Chloride (HCl) emissions (directly and as a surrogate for inorganic HAPs) shall not exceed 0.004 pounds per million Btu heat input (as a 3-hour average) and 90.95 tons per rolling, 12-month period.</p> <p>PM-10 filterable emissions (as a surrogate for non-mercury metal HAPs) shall not exceed 0.012 pounds per million Btu heat input (as a 3-hour average)</p> <p>CO emissions (as a surrogate for organic HAPs) shall not exceed 0.150 pounds per million Btu heat input (as a 3-hour average) and 3,410 tons per rolling, 12-month period.</p> <p>See b)(2)c-d.</p>



(2) Additional Terms and Conditions

- a. The permittee shall prepare and submit to the Ohio EPA Southeast District Office a unit-specific monitoring plan for each monitoring system (PM, SO<sub>2</sub>, NO<sub>x</sub>, CO, CO<sub>2</sub> or O<sub>2</sub> and Hg) at least 45 days before commencing certification testing of the monitoring systems. The plan must address the requirements in 40 CFR 75 and paragraphs (s)(1) through (s)(6) of 40 CFR 60.49Da.

[40 CFR 60.13]; [40 CFR Part 60, Appendix F]; and [40 CFR Part 75]

- b. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), it has been determined that the use of good combustion practices, SCR, a baghouse, limestone-based or ammonia-based FGD, WESP and the emissions limitations listed under OAC rules 3745-31-10 through 20 above constitutes BACT for this emissions unit.

- c. With the exception of Hg, a surrogate approach has been used to establish Maximum Achievable Control Technology (MACT) emissions levels for hazardous air pollutants (HAPs). The non-mercury metal HAPs emissions level is reflected in the PM<sub>10</sub>(filterable) emissions limit, the inorganic HAPs emissions level is reflected in the HF and HCl, emissions limits and the organic HAPs emissions level is reflected in the CO emissions limit. Compliance with these surrogate emissions limits is a demonstration of case-by-case MACT for these emissions units.

The continuous SO<sub>2</sub> monitoring system shall be used as an additional monitoring parameter for inorganic acid HAP emissions because the wet FGD system used to control SO<sub>2</sub> emissions is also an effective control system for HCl, HF and other inorganic acid HAPs. In addition, the continuous CO monitoring system shall be used as a monitoring parameter for organic HAP emissions since CO and organic HAP emissions are directly related to combustion efficiency.

- d. Sorbent Injection/Activated Carbon Injection (ACI) shall be utilized as necessary to comply with the Hg emissions limits.
- e. The terms and conditions contained in this permit for these emissions units (B001 & B002) shall modify terms and conditions for these emissions units contained in fully effective permit to install 06-08138 issued Draft on August 9, 2007, and Final on February 7, 2008. This subsequent administrative modification is being issued for B001 and B002, to reflect a change in the applicability of OAC rule 3745-31-28 after February 7, 2008 (post-issuance change), and to correct typographical errors.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Prior to the installation of the continuous SO<sub>2</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance



with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous SO<sub>2</sub> monitoring system meets the requirements of Performance Specification 2; and the U.S. EPA shall certify that the continuous SO<sub>2</sub> monitoring system meets the requirements under 40 CFR Part 75, which may be approved through the recommendation for certification by Ohio EPA to U.S. EPA. Once received, the letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be maintained on-site and made available to the director (and the appropriate Ohio EPA District Office or local air agency) upon request.

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

[40 CFR 60.13]; [40 CFR Part 60, Appendix B]; and [40 CFR Part 75]

- (2) The permittee shall install, operate, and maintain equipment to continuously monitor and record SO<sub>2</sub> emissions from each 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 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 on an hourly basis;
- b. emissions of SO<sub>2</sub> in all units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of each emissions unit, continuous SO<sub>2</sub> monitoring system, and control equipment;
- g. the date, time, and hours of operation of each emissions unit without the control equipment and/or the continuous SO<sub>2</sub> monitoring system;
- h. the date, time, and hours of operation of each emissions unit during any malfunction of the control equipment and/or 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 d)(2)g. and d)(2)h.

[40 CFR 60.13]; [40 CFR Part 60, Appendices B & F]; and [40 CFR Part 75]



- (3) Prior to the installation of the continuous NO<sub>x</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous NO<sub>x</sub> monitoring system meets the requirements of Performance Specification 2; and the U.S. EPA shall certify that the continuous NO<sub>x</sub> monitoring system meets the requirements under 40 CFR Part 75, which may be approved through the recommendation for certification by Ohio EPA to U.S. EPA. Once received, the letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be maintain on-site and made available to the director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

[40 CFR 60.13]; [40 CFR Part 60, Appendix B]; and [40 CFR Part 75]

- (4) The permittee shall install, operate, and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from each 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 data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to:

- a. emissions of NO<sub>x</sub> in parts per million on an hourly basis;
- b. emissions of NO<sub>x</sub> in all units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of each emissions unit, continuous NO<sub>x</sub> monitoring system, and control equipment;
- g. the date, time, and hours of operation of each emissions unit without the control equipment and/or the continuous NO<sub>x</sub> monitoring system;
- h. the date, time, and hours of operation of each emissions unit during any malfunction of the control equipment and/or 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 d)(4)g. and d)(4)h.

[40 CFR 60.13]; [40 CFR Part 60, Appendices B & F]; and [40 CFR Part 75]

- (5) Prior to the installation of the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 3. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system meets the requirements of Performance Specification 3; and the U.S. EPA shall certify that the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system meets the requirements under 40 CFR Part 75, which may be approved through the recommendation for certification by Ohio EPA to U.S. EPA. Once received, the letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be maintain on-site and made available to the director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

[40 CFR 60.13]; [40 CFR Part 60, Appendix B]; and [40 CFR Part 75]

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

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

- a. percent on an hourly basis;
- b. results of quarterly cylinder gas audits or linearity checks;
- c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- d. results of required relative accuracy test audit(s);
- e. hours of operation of each emissions unit, continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system;
- f. the date, time, and hours of operation of each emissions unit without the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system;
- g. the date, time, and hours of operation of each emissions unit during any malfunction of the continuous CO<sub>2</sub> or O<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 d)(6)f. and d)(6)g.

[40 CFR 60.13]; [40 CFR Part 60, Appendices B & F]; and [40 CFR Part 75]

- (7) The permittee shall install the PM monitoring system in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 11. The Ohio EPA, Central Office shall certify the continuous PM monitoring system meets the requirements of Performance Specification 11 upon satisfactory completion of initial certification testing. Once received, the letter(s)/document(s) of certification under Part 60 and certification and made available to the director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

- (8) The permittee shall install, operate, and maintain equipment to continuously monitor and record PM emissions from each emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

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

- a. emissions of PM in all units of the applicable standard(s) in the appropriate averaging period (40 CFR Part 60, Subpart Da requires a 24-hour (block) averages calculated using U.S. EPA reference Method 19);
- b. results of quarterly accuracy test audits;
- c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- d. hours of operation of each emissions unit, continuous PM monitoring system, and control equipment;
- e. the date, time, and hours of operation of each emissions unit without the control equipment and/or the continuous PM monitoring system;
- f. the date, time, and hours of operation of each emissions unit during any malfunction of the control equipment and/or the continuous PM monitoring system; as well as,
- g. the reason (if known) and the corrective actions taken (if any) for each such event in d)(8)e. and d)(8)f.

At a minimum, valid continuous monitoring system hourly averages shall be obtained for 90 percent of all operating hours on a 30-day rolling average basis.

The 1-hour arithmetic averages required shall be expressed in ng/J, MMBtu/h, or lb/MWh and shall be used to calculate the boiler operating day daily arithmetic average



emission concentrations. The 1-hour arithmetic averages shall be calculated using the data points required under Section 60.13(e)(2) of Subpart A of 40 CFR Part 60.

All valid continuous monitoring system data shall be used in calculating average emission concentrations even if the minimum continuous emission monitoring system data requirements are not met.

When PM emissions data are not obtained because of continuous emission monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, emissions data shall be obtained by using other monitoring systems as approved by U.S. EPA or EPA Reference Method 19 to provide, as necessary, valid emissions data for a minimum of 90 percent of all operating hours per 30-day rolling average.

- (9) The permittee shall conduct a performance evaluation of the continuous monitoring system according to the applicable requirements of Section 60.13, Performance Specification 11 in Appendix B of 40 CFR Part 60, and Procedure 2 in Appendix F of 40 CFR Part 60. During each relative accuracy test run of the continuous emission monitoring system required by Performance Specification 11 in Appendix B of 40 CFR Part 60, PM and O<sub>2</sub> (or CO<sub>2</sub>) data shall be collected concurrently (or within a 30-to 60-minute period) by both the continuous emission monitors and conducting performance tests using the following test methods:
- a. For PM, EPA Reference Method 5, 5B, or 17 shall be used.
  - b. For O<sub>2</sub> (or CO<sub>2</sub>), EPA Reference Method 3, 3A, or 3B, as applicable shall be used.
- (10) If the permittee elects to discontinue the use of the PM continuous emissions monitoring system (CEMS), the permittee shall properly install, operate, and maintain equipment to continuously monitor and record the secondary voltage, in kilovolts, and the current, in milliamperes, for each of the fields within the ESP during operation of each emissions unit, including periods of start-up and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the secondary voltage, in kilovolts, and the current, in milliamperes for each of the fields within the ESP on an hourly basis.

Whenever the monitored value for the voltage and/or current within a field deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 ranges specified below, 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: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the voltage and



current readings for the field immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

Acceptable ranges for the secondary voltage and current for each field within the ESP shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.

These ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the ranges based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for each emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a permit modification.

- (11) If the permittee elects to discontinue the use of the PM CEMS, the permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of each emissions unit, including periods of start-up and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on an hourly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 below, 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: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.



This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for each emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a permit modification.

- (12) The permittee shall install and operate a Hg CEMS to measure and record the concentration of Hg in the exhaust gases from each stack according to the requirements below:
- a. For an affected facility that is also subject to the requirements of Subpart I of 40 CFR Part 75, the permittee may install, certify, maintain, operate and quality-assure the data from an Hg CEMS according to 40 CFR Part 75.10 and Appendices A and B to 40 CFR Part 75.
  - b. As an alternative to the CEMS requirements above, the permittee may use a sorbent trap monitoring system (as defined in 40 CFR Part 72.2) to monitor Hg concentration, according to the procedures described in 40 CFR Part 75.15 and Appendix K to 40 CFR Part 75.
  - c. The permittee shall calculate the Hg emission rate in pounds/trillion Btu (as a 12-month rolling average), and pounds per rolling, 12-month period for each calendar month of the year, using hourly Hg concentrations measured in accordance with d)(12)a. or d)(12)b.
- (13) Prior to the installation of the continuous CO monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate). The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous CO monitoring system meets the requirements of Performance Specifications 4 or 4a and 6. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

[40 CFR 60.13] and [40 CFR Part 60, Appendix B]

- (14) The permittee shall operate and maintain equipment to continuously monitor and record CO 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 Parts 60.



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

- a. emissions of CO in parts per million on an hourly basis;
- b. emissions of CO in pounds per hour and in all units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous CO monitoring system, and control equipment;
- g. the date, time, and hours of operation of each emissions unit without the control equipment and/or the continuous CO monitoring system;
- h. the date, time, and hours of operation of each emissions unit during any malfunction of the control equipment and/or the continuous CO 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).

[40 CFR 60.13] and [40 CFR Part 60, Appendices B & F]

- (15) The permittee shall record the monthly hours of operation of each emissions unit for the purpose of determining compliance with the rolling, 12-month period emission limitations.

e) Reporting Requirements

- (1) The permittee shall comply with the following quarterly reporting requirements for each 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 Ohio EPA, Southeast District Office, documenting all instances of SO<sub>2</sub> emissions in excess of any applicable limitation 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). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.



- b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 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. the location of the continuous SO<sub>2</sub> monitor;
  - iv. the exceedance report as detailed in e)(1)a. above;
  - v. the total SO<sub>2</sub> emissions for the calendar quarter (tons);
  - vi. the total operating time (hours) of each emissions unit;
  - vii. the total operating time of the continuous SO<sub>2</sub> monitoring system while each emissions unit was in operation;
  - viii. results and dates of quarterly cylinder gas audits or linearity checks;
  - ix. results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
  - x. 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, emissions unit, and/or control equipment;
  - xii. the date, time, and duration of any downtime\* of the continuous SO<sub>2</sub> monitoring system and/or control equipment while each emissions unit was in operation; and
  - xiii. the reason (if known) and the corrective actions taken (if any) for each event in e)(1)b.xi. and e)(1)b.xii.

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR Part 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.

\* Each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limitation.

[40 CFR 60.7] and [40 CFR Part 75]



- (2) The permittee shall comply with the following quarterly reporting requirements for each 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 Ohio EPA, Southeast District Office, documenting all instances of NO<sub>x</sub> emissions in excess of any applicable limitation 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). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.
  - b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous NO<sub>x</sub> and other associated monitors;
    - iii. the location of the continuous NO<sub>x</sub> monitor;
    - iv. the exceedance report as detailed in e)(2)a. above;
    - v. the total NO<sub>x</sub> emissions for the calendar quarter (tons);
    - vi. the total operating time (hours) of each emissions unit;
    - vii. the total operating time of the continuous NO<sub>x</sub> monitoring system while each emissions unit was in operation;
    - viii. results and dates of quarterly cylinder gas audits or linearity checks;
    - ix. results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
    - x. the results of any relative accuracy test audit showing the continuous NO<sub>x</sub> monitor out-of-control and the compliant results following any corrective actions;
    - xi. the date, time, and duration of any/each malfunction\* of the continuous NO<sub>x</sub> monitoring system, emissions unit, and/or control equipment;
    - xii. the date, time, and duration of any downtime\* of the continuous NO<sub>x</sub> monitoring system and/or control equipment while each emissions unit was in operation; and



- xiii. the reason (if known) and the corrective actions taken (if any) for each event in e)(2)b.xi. and e)(2)b.xii.

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR Part 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.

\* Each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limitation.

[40 CFR 60.7] and [40 CFR Part 75]

- (3) The permittee shall comply with the following quarterly reporting requirements for each emissions unit and its continuous CO<sub>2</sub> or O<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 Ohio EPA, Southeast District Office, documenting all instances of continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system downtime and malfunction while each emissions unit was on line.
  - b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 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> or O<sub>2</sub> and other associated monitors;
    - iii. the location of the continuous CO<sub>2</sub> or O<sub>2</sub> monitor;
    - iv. the total operating time (hours) of each emissions unit;
    - v. the total operating time of the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system while each emissions unit was in operation;
    - vi. results and dates of quarterly cylinder gas audits or linearity checks;
    - vii. results and dates of the relative accuracy test audit(s) (during appropriate quarter(s));
    - viii. the results of any relative accuracy test audit showing the continuous CO<sub>2</sub> or O<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> or O<sub>2</sub> monitoring system while each emissions unit was in operation;
    - x. the date, time, and duration of any downtime\* of the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system while each emissions unit was in operation; and



- xi. the reason (if known) and the corrective actions taken (if any) for each event in e)(3)b.ix. and e)(3)b.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 if there is an exceedance of any applicable limitation.

[40 CFR 60.7] and [40 CFR Part 75]

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

[40 CFR Part 75]

- (5) Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. actual start-up date (within 15 days after such date); and
  - c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
50 West Town Street, Suite 700  
P. O. Box 1049  
Columbus, Ohio 43216-1049

And

Southeast District Office of the Ohio EPA  
Division of Air Pollution Control  
2195 Front Street  
Logan, Ohio 43138.

- (6) If the permittee elects to discontinue the use of the PM CEMs, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of each emissions unit:



- a. each period of time when the secondary voltage and current for each field within the ESP was outside of the range specified by the manufacturer or established during a complying emissions test;
- b. an identification of each incident of deviation described in e)(6)a. where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in e)(6)a. where prompt corrective action, that would bring the field into compliance with the acceptable ranges for voltage and current, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in e)(6)a. where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

- (7) If the permittee elects to discontinue the use of the PM CEMs, the permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of each emissions unit:
- a. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer or established during a complying emissions test;
  - b. an identification of each incident of deviation described in e)(7)a. where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in e)(7)a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in e)(7)a. where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

- (8) The permittee shall comply with the following quarterly reporting requirements for each emissions unit and its continuous PM 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 Ohio EPA, Southeast District Office, documenting all instances of PM emissions in excess of any applicable limitation specified in this permit, 40 CFR Part 60, OAC Chapter 3745-17, 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). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.

- b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:
- i. the facility name and address;
  - ii. the manufacturer and model number of the continuous PM and other associated monitors;
  - iii. the location of the continuous PM monitor;
  - iv. the exceedance report as detailed in e)(8)a. above;
  - v. the total PM emissions for the calendar quarter (tons);
  - vi. the total operating time (hours) of each emissions unit;
  - vii. the total operating time of the continuous PM monitoring system while each emissions unit was in operation;
  - viii. results and dates of quarterly cylinder gas audits or linearity checks;
  - ix. results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
  - x. the results of any relative accuracy test audit showing the continuous PM 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 PM monitoring system, emissions unit, and/or control equipment;
  - xii. the date, time, and duration of any downtime\* of the continuous PM monitoring system and/or control equipment while each emissions unit was in operation; and
  - xiii. the reason (if known) and the corrective actions taken (if any) for each event in e)(8)b.xi. and e)(8)b.xii.

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

\* Each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limitation.

- (9) For Hg, the permittee shall submit quarterly reports to the Ohio EPA, Southeast District Office. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:



- a. company name and address;
  - b. date of report and beginning and ending dates of the reporting period;
  - c. the applicable Hg emission limitation;
  - d. for each month in the reporting period:
    - i. the number of unit operating hours;
    - ii. the number of unit operating hours with data for Hg concentration, stack gas flow rate, and moisture (if required);
    - iii. the monthly Hg emission rate;
    - iv. the number of hours of valid data excluded from the calculation of the monthly Hg emission rate, due to unit or control malfunction;
    - v. the Hg emission rate in pounds/trillion Btu (as a 12-month rolling average), and pounds per rolling, 12-month period; and
  - e. the data assessment report (DAR) required by Appendix F to 40 CFR Part 60, or an equivalent summary of QA test results if the QA of 40 CFR Part 75 are implemented.
- (10) The permittee shall comply with the following quarterly reporting requirements for each emissions unit and its continuous CO 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 CO emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, 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 31, April 30, July 31, and October 31 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous CO 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 CO emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of each emissions unit;
- vii. the total operating time of the continuous CO monitoring system while each emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO 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 CO monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime\*\* of the continuous CO monitoring system and/or control equipment while each emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

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

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

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

[40 CFR 60.7]

- (11) The permittee shall submit a signed statement with each required quarterly report indicating whether:
  - a. The required continuous monitoring system calibration, span, and drift checks or other periodic audits have or have not been performed as specified.
  - b. The data used to show compliance was or was not obtained in accordance with approved methods and procedures of 40 CFR Part 60(and/or 40 CFR Part 75) and is representative of plant performance.



- c. The minimum data requirements have or have not been met; or, the minimum data requirements have not been met due to errors that were unavoidable.
- d. Compliance with the standards has or has not been achieved during the reporting period.

f) Testing Requirements

- (1) Within 60 days after achieving the maximum production rate at which the facility will be operated, but no later than 180 days after initial start-up at the facility, the permittee shall conduct certification tests of the continuous SO<sub>2</sub> monitoring system in units of the applicable standard(s) to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 2; ORC section 3704.03(I); and 40 CFR Part 75. The permittee may test the continuous SO<sub>2</sub> monitoring system in accordance with requirements for monitoring systems subject to 40 CFR Part 75, Appendix B, if the test results are reported in units of the applicable standard(s) and approved by Ohio EPA.

Personnel from the Ohio EPA, Central Office and the Ohio EPA, Southeast District Office shall be notified 45 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the Ohio EPA, Central Office and one copy to the Ohio EPA, Southeast District Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification, or recommendation for certification by Ohio EPA to U.S. EPA, of the continuous SO<sub>2</sub> monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; ORC section 3704.03(I); and 40 CFR Part 75.

[40 CFR 60.13]; [40 CFR Part 60, Appendices B & F]; and [40 CFR Part 75]

- (2) Within 60 days after achieving the maximum production rate at which the facility will be operated, but no later than 180 days after initial start-up at the facility, the permittee shall conduct certification tests of the continuous NO<sub>x</sub> monitoring system in units of the applicable standard(s) to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 2; ORC section 3704.03(I); and 40 CFR Part 75. The permittee may test the continuous NO<sub>x</sub> monitoring system in accordance with requirements for monitoring systems subject to 40 CFR Part 75, Appendix B, if the test results are reported in units of the applicable standard(s) and approved by Ohio EPA.

Personnel from the Ohio EPA, Central Office and the Ohio EPA, Southeast District Office shall be notified 45 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the Ohio EPA, Central Office and one copy to the Ohio EPA, Southeast District Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification, or recommendation for certification by Ohio EPA to U.S. EPA, of the continuous NO<sub>x</sub> monitoring system shall be granted upon determination by the Ohio



EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; ORC section 3704.03(I); and 40 CFR Part 75.

[40 CFR 60.13]; [40 CFR Part 60, Appendices B & F]; and [40 CFR Part 75]

- (3) Within 60 days after achieving the maximum production rate at which the facility will be operated, but no later than 180 days after initial start-up at the facility, the permittee shall conduct certification tests of the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 3; ORC section 3704.03(I); and 40 CFR Part 75. The permittee may test the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system in accordance with requirements for monitoring systems subject to 40 CFR Part 75, Appendix B, if the test results are approved by Ohio EPA.

Personnel from the Ohio EPA, Central Office and the Ohio EPA, Southeast District Office shall be notified 45 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the Ohio EPA, Central Office and one copy to the Ohio EPA, Southeast District Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification, or recommendation for certification by Ohio EPA to U.S. EPA, of the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3; ORC section 3704.03(I); and 40 CFR Part 75.

Ongoing compliance with the CO<sub>2</sub> or O<sub>2</sub> monitoring requirements 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 Recordkeeping Section of this permit; and 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.

[40 CFR 60.13]; [40 CFR Part 60, Appendices B & F]; and [40 CFR Part 75]

- (4) Within 60 days after achieving the maximum production rate at which the facility will be operated, but no later than 180 days after initial start-up at the facility, the permittee shall conduct certification tests of the continuous PM monitoring system in units of the applicable standard(s) to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 11 and ORC section 3704.03(I).

Personnel from the Ohio EPA, Central Office and the Ohio EPA, Southeast District Office shall be notified 45 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the Ohio EPA, Central Office and one copy to the Ohio EPA, Southeast District Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification, or recommendation for certification by Ohio EPA to U.S. EPA, of the continuous PM monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 11 and ORC section 3704.03(I).



- (5) Within 60 days after achieving the maximum production rate at which the facility will be operated, but no later than 180 days after initial start-up at the facility, the permittee shall conduct certification tests of the continuous CO monitoring system in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate) and 6; and ORC section 3704.03(l).

Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous CO monitoring system shall be granted upon determination by the Ohio EPA Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 4 or 4a (as appropriate) and 6 and ORC section 3704.03(l).

[40 CFR 60.13] and [40 CFR Part 60, Appendices B & F]

- (6) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitations:

Particulate matter less than ten microns (PM-10) emissions (filterable only) shall not exceed 0.012 pound per million Btu heat input(as a 3-hour average).

PM-10(filterable and condensible) emissions shall not exceed 0.024 pound per million Btu heat input(as a 3-hour average),125 pounds per hour(as a 3-hour average) and 546 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the pound per million Btu and pound per hour PM-10 emissions limitations shall be demonstrated based upon the applicable emissions tests specified in f)(7), the monitoring and record keeping requirements in d) and the reporting requirements in e).

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated by the record keeping required pursuant to d) and the associated emission factors derived from emissions testing as specified in f)(7).

- b. Emission Limitation:

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.24 pound per million Btu heat input(as a 3-hour rolling average),1,246 pounds per hour(as a 3-hour average),0.184 pound per million Btu heat input(as a 24-hour rolling average), 0.15 pound per million Btu heat input(as a 30-day rolling average) and 3,410 tons per rolling,12-month period.



Applicable Compliance Method:

Compliance with the pound per million Btu and pound per hour SO<sub>2</sub> emissions limitations shall be demonstrated based upon the applicable emissions tests specified in f)(7), the monitoring and record keeping requirements in d) and the reporting requirements in e).

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated by the record keeping required pursuant to d) and the associated emission factors derived from emissions testing as specified in f)(7).

c. Emission Limitations:

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.10 pound per million Btu heat input(as a 24-hour average), 519 pounds per hour(as a 24-hour average),0.07 pound per million Btu heat input(30-day rolling average) and 1,592 tons per rolling 12-month period.

Applicable Compliance Methods:

Compliance with the pound per million Btu and pound per hour NO<sub>x</sub> emissions limitations shall be demonstrated based upon the applicable emissions tests specified in f)(7), the monitoring and record keeping requirements in d) and the reporting requirements in e).

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated by the record keeping required pursuant to d) and the associated emission factors derived from emissions testing as specified in f)(7).

d. Emission Limitations:

Carbon monoxide (CO) emissions shall not exceed 0.150 pound per million Btu heat input(as a 3-hour average), 779 pounds per hour(as a 3-hour average), and 3,410 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the pound per million Btu and pound per hour CO emissions limitations shall be demonstrated based upon the applicable emissions tests specified in f)(7), the monitoring and record keeping requirements in d) and the reporting requirements in e).

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated by the associated emission factors derived from emissions testing as specified in f)(7).

e. Emission Limitations:

Volatile organic compound (VOC) emissions shall not exceed 0.0037 pound per million Btu heat input(as a 3-hour average), 19.2 pounds per hour(as a 3-hour average) and 83.2 tons per rolling, 12-month period.



Applicable Compliance Methods:

Compliance with the pound per million Btu and pound per hour VOC emissions limitations shall be demonstrated based upon the applicable emissions tests specified in f)(7).

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated by the associated emission factors derived from emissions testing as specified in f)(7).

f. Emission Limitations:

Lead (Pb) emissions shall not exceed 0.00000982 pound per million Btu heat input(as a 3-hour average), 0.051 pound per hour(as a 3-hour average), and 0.22 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the pound per million Btu and pound per hour Pb emissions limitations shall be demonstrated based upon the applicable emissions tests specified in f)(7).

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated by the associated emission factors derived from emissions testing as specified in f)(7).

g. Emission Limitations:

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) mist emissions shall not exceed 0.0075 pound per million Btu heat input(as a 3-hour average), 38.9 pounds per hour(as a 3-hour average), and 170.5 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the pound per million Btu and pound per hour H<sub>2</sub>SO<sub>4</sub> emissions limitations shall be demonstrated based upon the applicable emissions tests specified in f)(7).

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated by the associated emission factors derived from emissions testing as specified in f)(7).

h. Emission Limitation:

No owner or operator subject to the provisions of Subpart Da shall cause to be discharged into the atmosphere from any affected facility any gases which exhibit greater than 20 percent opacity (as a 6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through emissions testing performed in accordance with Method 9 of 40 CFR Part 60,



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

i. Emission Limitations:

Mercury (Hg) emissions shall not exceed 1.4 pounds per trillion Btu heat input as a 12-month rolling average and 63.7 pounds per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the pounds per trillion Btu on 12-month rolling average and pounds per rolling, 12-month period Hg emissions limitations shall be demonstrated by the applicable emissions tests specified in f)7, the monitoring and record keeping required pursuant to d) and the reporting requirements in e).

j. Emission Limitations:

Hydrogen Fluoride (HF) emissions shall not exceed 0.0004 pounds per million Btu heat input (as a 3-hour average) and 9.09 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the pounds per million Btu (as a 3-hour average) and tons per rolling, 12-month period HF emission limitation shall be demonstrated based upon the applicable emissions tests specified in f)(7). In addition, ongoing control shall be demonstrated by the continuous SO<sub>2</sub> monitoring requirements specified in d), which confirm proper operation of the SO<sub>2</sub> control equipment and therefore can be used as a continuous monitoring surrogate for inorganic acid gas emissions.

k. Emission Limitations:

Hydrogen Chloride (HCl) emissions shall not exceed 0.004 pounds per million Btu heat input (as a 3-hour average) and 90.95 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the pounds per million Btu (as a 3-hour average) and tons per rolling, 12-month period HCl emission limitation shall be demonstrated based upon the applicable emissions tests specified in f)(7). In addition, ongoing control shall be demonstrated by the continuous SO<sub>2</sub> monitoring requirements specified in d), which confirm proper operation of the SO<sub>2</sub> control equipment and therefore can be used as a continuous monitoring surrogate for inorganic acid gas emissions.

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

a. The emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial start-up of the emissions unit.



- b. The emissions testing shall be conducted to demonstrate compliance with the applicable emissions limitations for Hg, HCl, HF, PM-10, NO<sub>x</sub>, SO<sub>2</sub>, VOC, CO, Pb, H<sub>2</sub>SO<sub>4</sub> and opacity, in the appropriate averaging period(s).
- c. The following test methods shall be employed to demonstrate compliance with the applicable emissions limitations:

PM-10	Method 201(40 CFR Part 51, Appendix M) Method 202(40 CFR Part 51, Appendix M)
SO <sub>2</sub>	Methods 1 through 4 and 6C of 40 CFR Part 60, Appendix A
NO <sub>x</sub>	Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A
CO	Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A
VOC	Methods 1 through 4 and 25, or Methods 1 through 4 and 25A (as appropriate), of 40 CFR Part 60, Appendix A
Pb	Methods 1 through 4 and 12 of 40 CFR Part 60, Appendix A
H <sub>2</sub> SO <sub>4</sub>	Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A
Opacity	Method 9 of 40 CFR Part 60, Appendix A
Hg	ASTM D6784-02, Standard Test Method for Elemental, Oxidized, Particle-Bound, and Total Hg in Flue Gas Generated from Coal-Fired Stationary Sources (also known as the Ontario Hydro Method)
HCl	Methods 1 through 4 and 26, or Methods 1 through 4 and 26A (as appropriate), of 40 CFR Part 60, Appendix A
HF	Methods 1 through 4 and 26, or Methods 1 through 4 and 26A (as appropriate), of 40 CFR Part 60, Appendix A

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

- d. The test(s) shall be conducted while the emissions unit is operating at greater than 90% of the boiler heat input rating, unless otherwise specified or approved by the Ohio EPA Southeast District Office.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**

**Permit Number:** P0104461

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- f. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - 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 Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.
- g) Miscellaneous Requirements
- (1) None.