Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

9/15/2011

Certified Mail

Facility ID: 1318000246
Permit Number: P0094247
County: Cuyahoga

Marc Divis
Cleveland Thermal LLC
1921 Hamilton Avenue
Cleveland, OH 44114-3515

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

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 6/28/2011. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

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

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

and

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

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

Cc: Cleveland Division of Air Quality

Response to Comments

Response to comments for: Title V Permit

Facility ID:	1318000246
Facility Name:	Cleveland Thermal LLC
Facility Description:	Steam heat producing facility - coal handling system, two cooling towers, three 170 mmBtu/hr oil fired boilers, two 220 mmBtu/hr natural gas/oil fired boilers, and three 228 mmBtu/hr chain grate coal fired boilers controlled by a mechanical dust collector.
Facility Address:	1921 Hamilton Avenue Cleveland, OH 44114-3515 Cuyahoga County
Permit #:	P0094247, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Plain Dealer on 06/30/2011. The comment period ended on 07/30/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: Statement of Basis document discrepancies

   Comment: Cleveland Thermal identifies an error in the reporting requirements in the Statement of Basis for sources B001-B003, B005 and B006 as they relate to particulate emissions. The Statement of Basis currently requires quarterly reporting of pressure drop deviations and COMs excess emission reports. These emissions units do not have mechanical collectors or a COM system. The draft permit identifies the correct reporting requirements for sources B001-B003, B005 and B006.

   Response: CDAQ agrees with this comment. The Statement of Basis has been revised to include the correct reporting requirement for sources B001-B003, B005 and B006 which are consistent with the draft permit. The Statement of Basis identifies semi-annual reporting of visible emissions.

Comment: Cleveland Thermal identifies an error in the monitoring and recordkeeping requirements in the Statement of Basis for sources B001-B003, B005 and B006 as they relate to S02 emissions. The Statement of Basis currently requires monitoring and recordkeeping through composite coal sampling. These emissions units are not coal burning units. The draft permit identifies the correct monitoring and recordkeeping requirements for sources B001-B003, B005 and B006.

Response: CDAQ agrees with this comment. The Statement of Basis has been revised to include the correct monitoring and recordkeeping requirement for sources B001-B003, B005 and B006 which are consistent with the draft permit. The Statement of Basis identifies monitoring and recordkeeping of the fuel oil analysis and SO2 emission calculations.

Comment: Cleveland Thermal requests clarification of the emission limitation stated in the Statement of Basis for sources B001-B003, B005 and B006 as they relate to particulate emissions. The Statement of Basis currently provides an emission limitation of 0.14 lb/mmBtu. The draft permit states an emission limitation of 0.10 lb/mmBtu.

Response: The correct particulate emission limitation for sources B001-B003, B005 and B006 is 0.1 lb/mmBtu as stated in the draft permit. The Statement of Basis has been revised to reflect this emission limitation which is consistent with the draft permit. The emission limitation is based on OAC rule 3745-17-10(C)(1) which establishes the limitation based on the total heat input from all boilers at the Cleveland Thermal facility. Use of Figure 1 Curve P-1 from this rule establishes a limit of 0.1 lb/mmBtu based on a total heat input of 1,634 mmBtu/hr.

Comment: Cleveland Thermal requests the option to sample the coal fuel for use in the boilers from the point of origin of the coal or on an “as received basis” instead of sampling in an “as burned” state. The facility notes that with the more stringent SO2 emission limitation established in OAC rule 3745-18-24(G), the emission rates vary depending on weather conditions during transport and storage of the coal.

Response: The pemit has been revised to allow sampling of the coal on an “as received” basis by the permittee or the coal supplier. The OAC rule 3745-18-04(D)(3)allows “as received” sampling for coal fired emissions units with a heat input totaling 1,000 mmBtu/hr or less.

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Cleveland Thermal LLC

Facility ID:	1318000246
Permit Number:	P0094247
Permit Type:	Renewal
Issued:	9/15/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Cleveland Thermal LLC

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Authorization

Facility ID: 1318000246
Facility Description:
Application Number(s): A0025734, A0025735, A0025736, A0025737
Permit Number: P0094247
Permit Description: Title V renewal permit for Cleveland Thermal. Permit consists of: coal handling system, two cooling towers, three 170 mmBtu/hr oil fired boilers, two 220 mmBtu/hr natural gas/oil fired boilers, and three 228 mmBtu/hr chain grate coal fired boilers controlled by a mechanical dust collector.
Permit Type: Renewal
Issue Date: 9/15/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0094245

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

Cleveland Thermal LLC
1921 Hamilton Avenue
Cleveland, OH 44114-3515

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

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Cleveland Division of Air Quality. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

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

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written 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.

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

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

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

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

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

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

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

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Cleveland Division of Air Quality.

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

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

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

a) 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 reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the

Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthe permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(2) a combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

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

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(3) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that

qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)Records Retention Requirements Under State Law Only

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

25. Inspections and Information Requests

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

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

26. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air

agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

27. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.

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

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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) 5.

2. Emissions units B103 and B105 at the Canal Road plant have not been operated during the past five years. Before these emissions units are granted authorization to operate, the permittee shall conduct, or have conducted, particulate, sulfur dioxide, and visible particulate emission testing for these emissions units to demonstrate compliance with the allowable mass emission rates of 0.10 lb/mmBtu actual heat input, 1.5 lbs/mmBtu actual heat input, and 20% opacity as a 6-minute average (except as provided by rule), respectively. In addition, the permittee shall comply with any applicable State and federal new source review and permitting requirements prior to the activation of these emissions units.

   Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

   Compliance with the allowable mass emission rate for sulfur dioxide shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6C.

   Compliance with the allowable opacity limitation for visible particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

   The tests shall be conducted while these emissions units are operating at or near their maximum capacities. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

3. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved a compliance assurance monitoring (CAM) plan for emissions units B101, B102 and B104. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

   [Authority for term: 40 CFR Part 64]

4. Emissions unit B004 at the Hamilton Road plant has not operated during the past five years. Before this emissions unit is granted authorization to operate, the permittee shall conduct, or have conducted, particulate, sulfur dioxide, nitrogen dioxide, and visible particulate emission testing for these emissions units to demonstrate compliance with the allowable mass emission rates of 0.10 lb/mmBtu actual heat input, 1.0 lb/mmBtu actual heat input, 0.3 lb/mmBtu actual heat input, and 20% opacity as a 6-minute average (except as provided by rule), respectively. In addition, the permittee shall comply with any applicable State and federal new source review and permitting requirements prior to the activation of this emissions unit.

   Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

   Compliance with the allowable mass emission rate for sulfur dioxide shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6C.

Compliance with the allowable opacity limitation for visible particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

The tests shall be conducted while these emissions units are operating at or near their maximum capacities. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

C. Emissions Unit Terms and Conditions

1. F103, Coal HandlingSystem

Operations, Property and/or Equipment Description:

250 TPH Coal Unloading and Conveying System (located at the Canal Road Plant)

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 3745-17-07(B)(1)	Visible emissions of fugitive dust from any fugitive dust source shall not exceed 20% opacity as a three-minute average.
b.	OAC rule 3745-17-08(B)	reasonably available control measures (RACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)b.

(2) Additional Terms and Conditions

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

coal unloading

coal conveying system

b. The permittee shall employ reasonably available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall perform the following control measures to ensure compliance:

i. The speed that the rail car dumper unloads the cars shall be controlled and limited in a manner so as to minimize or eliminate visible emissions of fugitive dust.

ii. The doors, windows and other openings of the rail dumper and conveyor enclosures shall be maintained and adjusted or closed according to the meteorological conditions to effectively minimize or eliminate the visible emissions of fugitive dust.

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, for all material handling operations that are not adequately enclosed, the permittee shall perform daily inspections when this emissions unit is in operation. The daily inspections shall be performed during representative, normal operating conditions.

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

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

a. the date and reason any required inspection was not performed;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);

c. the dates the control measure(s) was (were) implemented; and

d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in d)(2)d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

e) Reporting Requirements

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

a. each day during which an inspection was not performed by the required frequency; and

b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

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

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible emissions of fugitive dust from any fugitive dust source shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the material handling operations identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -15,000 gpm cooling towers: P001, P002,

EU ID	Operations, Property and/or Equipment Description
P001	15,000 GPM Forced Draft Cooling Tower - (particulate emissions are controlled by drift eliminators and a impingement baffle) located at the Hamilton Ave Plant
P002	15,000 GPM Forced Draft Cooling Tower - (particulate emissions are controlled by drift eliminators and a impingement baffle) located at the Hamilton Ave Plant

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) (PTI# 13-2955 issued June 14, 1995)	Particulate emissions shall not exceed 2.0 lbs/hr and 8.76 tons per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 3.0 lbs/hr and 13.14 TPY. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average.
b.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall operate the drift eliminators and impingement baffle at all times when the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and 3745-31-05(A)(3) and PTI#13-02955]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the drift eliminators and impingement baffle were not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3) and PTI#13-02955]

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3) and PTI#13-02955]

(3) The permittee shall maintain monthly records that indicate the amounts of chemicals (e.g., corrosion inhibitors and biocide chemicals) added to the cooling tower, in pounds, and the total number of hours during the month when these chemicals were added to the cooling tower.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3) and PTI#13-02955]

(4) The permittee shall maintain monthly records of the average hourly emission rate of VOC for this emissions unit as follows:

totallbs of all VOC containing chemicals added/month (from d)(3)) divided by the total number of hours during the month when chemicals were added in the tower = average lbs of VOC chemicals used/hour

averagelbs of VOC chemical/hr x .70* = lbs of VOC per hour

* In accordance with PTI 13-2955, issued June 14, 1995, the percentage of VOC emitted to the atmosphere under standard conditions is approximately 70% of the VOC content of the chemicals added to the cooling tower.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3) and PTI#13-02955]

e) Reporting Requirements

(1) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any record showing that the drift eliminators or impingement baffle were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3) and PTI#13-02955]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) specify the average hourly VOC emission rate for each month. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3) and PTI#13-02955]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions shall not exceed 2.0 lbs/hr

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the AP-42 emission factor for wet cooling towers* (1.7 lbs of PE/1000 gal) by 2% of the water circulating flow (0.02), by the maximum hourly water flow rate (15,000 gal/min x 60 min/hr), and then by (1 - 0.95), which is the efficiency of the control equipment.

*AP-42, Compilation of Air Pollution Emission Factors, Fifth Edition, Supplement D (1-95), Table 13.4-1

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 1 -5 of 40 CFR, Part 60, Appendix A.

[Authority for term: OAC rules 3745-77-07(C)(1), 31-05(A)(3) and PTI#13-02955]

b. Emission Limitation:

Particulate emissions shall not exceed 8.76 TPY

Applicable Compliance Method:

Provided compliance with the hourly emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8,760, and then dividing by 2,000), compliance with the annual limitation shall also be demonstrated.

[Authority for term: OAC rules 3745-77-07(C)(1), 31-05(A)(3) and PTI#13-02955]

c. Emission Limitation -

VOC emissions shall not exceed 3.0 lbs/hr

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation may be based upon the record keeping performed pursuant to d)(3) and d)(4).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 of 40 CFR, Part 60, Appendix A.

[Authority for term: OAC rules 3745-77-07(C)(1), 31-05(A)(3) and PTI#13-02955]

d. Emission Limitation -

VOC emissions shall not exceed 13.14 TPY

Applicable Compliance Method:

Provided compliance with the hourly emission limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8,760, and then dividing by 2,000), compliance with the annual limitation shall also be demonstrated.

[Authority for term: OAC rules 3745-77-07(C)(1), 31-05(A)(3) and PTI#13-02955]

e. Emission Limitation -

Visible particulate emissions shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rules 3745-77-07(C)(1), 31-05(A)(3) and PTI#13-02955]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -170 mmBtu oil fired boilers: B001, B002, B003,

EU ID	Operations, Property and/or Equipment Description
B001	170 MMBtu/Hr Oil Fired Boiler (used for district heating and cooling system) located at the Hamilton Ave plant.
B002	170 MMBtu/Hr Oil Fired Boiler (used for district heating and cooling system) located at the Hamilton Ave plant.
B003	170 MMBtu/Hr Oil Fired Boiler (used for district heating and cooling system) located at the Hamilton Ave plant.

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 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(C)(1)	Particulate emissions shall not exceed 0.10 pound per mmBtu of actual heat input.
c.	OAC rule 3745-18-24(H)	Sulfur dioxide (SO2) emissions shall not exceed 1.0 pound per mmBtu of actual heat input
d.	40 CFR Part 63, Subpart DDDDD	See b)(2)b.

(2) Additional Terms and Conditions

a. Provided that this emissions unit meets the description of an “auxiliary boiler”, as defined in OAC rule 3745-110-01(B)(3), this emissions unit is not subject to the emission limits listed in OAC rule 3745-110-03(C).

b. On May 16, 2011, U.S. EPA decided to Stay the Boiler MACT (40 CFR Part 63, Subpart DDDDD). This delay of effectiveness will remain in place until the proceedings for judicial review are completed or U.S. EPA completes its

reconsideration of the rules, whichever is earlier, and the Agency publishes a notice in the Federal Register announcing that the rules are in effect. Upon being effective, this emissions unit will be subject to 40 CFR Part 63, Subpart DDDDD.

c) Operational Restrictions

(1) The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 lb of SO2/mmBtu of actual heat input.

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

d) Monitoring and/or Recordkeeping Requirements

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

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

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

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission

incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

e) Reporting Requirements

(1) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from d)(1) above. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 45 days after the deviation occurs.

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

(2) The permittee shall submit semiannual written reports to the Cleveland DAQ that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1). [This paragraph does not apply to the daily check for visible emissions under d)(2).]

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

b. Emission Limitation:

Particulate emissions shall not exceed 0.10 lb per mmBtu of actual heat input

Applicable Compliance Methods:
The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

The permittee may also demonstrate compliance based upon multiplying the maximum fuel oil capacity of the emissions unit (1130 gallons/hr) by the AP-42 emission factor* for No. 6 fuel oil (9.19(S) + 3.22 lbs/1000 gal), where S is the percent sulfur in the fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (170 mmBtu/hr).

*AP-42, Fifth Edition, Supplement D (7-98), Table 1.3-1

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

c. Emission Limitation:

Sulfur dioxide (SO2) emissions shall not exceed 1.0 pound per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that each shipment of oil meets the applicable limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 - 4 and 6 or 6C of 40 CFR, Part 60, Appendix A.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-18-24(H)]

(2) The permittee shall conduct, or have conducted, emission testing for either B001, B002 or B003 of this emissions unit group in accordance with the following requirements:

a. The emission testing shall be conducted. within 6 months of permit issuance.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions and opacity.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass particulate emission rate and opacity: Methods 1 - 5 of 40 CFR, Part 60, Appendix A for particulate emissions and Method 9 of 40 CFR, Part 60, Appendix A for opacity. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]

d. The emission testing shall be conducted while the emissions unit is operating at or near its normal steam load.

e. The emission testing shall be conducted while the emissions unit is burning the worst case fuel oil.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ 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.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ 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 Cleveland DAQ.

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

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -220 mmBtu/hr gas/oil boilers: B005, B006,

EU ID	Operations, Property and/or Equipment Description
B005	220 MMBtu/Hr Gas/Oil Fired Boiler (used for district heating and cooling system) located at the Hamilton Ave plant.
B006	220 MMBtu/Hr Gas/Oil Fired Boiler (used for district heating and cooling system) located at the Hamilton Ave plant.

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 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(C)(1)	Particulate emissions shall not exceed 0.10 pound per mmBtu of actual heat input
c.	OAC rule 3745-18-24(H)	Sulfur dioxide (SO2) emissions shall not exceed 1.0 pound per mmBtu of actual heat input
d.	40 CFR Part 63, Subpart DDDDD	See b)(2)b.

(2) Additional Terms and Conditions

a. Provided that this emissions unit meets the description of an “auxiliary boiler”, as defined in OAC rule 3745-110-01(B)(3), this emissions unit is not subject to the emission limits listed in OAC rule 3745-110-03(C).

b. On May 16, 2011, U.S. EPA decided to Stay the Boiler MACT (40 CFR Part 63, Subpart DDDDD). This delay of effectiveness will remain in place until the proceedings for judicial review are completed or U.S. EPA completes its reconsideration of the rules, whichever is earlier, and the Agency publishes a notice in the Federal Register announcing that the rules are in effect. Upon being effective, this emissions unit will be subject to 40 CFR Part 63, Subpart DDDDD.

c) Operational Restrictions

(1) The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 lb of SO2/mmBtu of actual heat input.

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

d) Monitoring and/or Recordkeeping Requirements

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

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

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

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal

operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

e) Reporting Requirements

(1) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from d)(1) above. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 45 days after the deviation occurs.

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

(2) The permittee shall submit semiannual written reports to the Cleveland DAQ that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1). [This paragraph does not apply to the daily check for visible emissions under d)(2).]

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

b. Emission Limitation:

Particulate emissions shall not exceed 0.10 pound per mmBtu of actual heat input

Applicable Compliance Methods:
The permittee shall demonstrate compliance with the particulate emission limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

The permittee may also demonstrate compliance based upon multiplying the maximum fuel oil capacity of the emissions unit (1,130 gallons/hr) by the AP-42 emission factor* for No. 6 fuel oil (9.19(S) + 3.22 lbs/1,000 gal), where S is the percent sulfur in the fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (220 mmBtu/hr).

*AP-42, Fifth Edition, Supplement D (7-98), Table 1.3-1

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

c. Emission Limitation:

Sulfur dioxide (SO2) emissions shall not exceed 1.0 pound per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that each shipment of oil meets the applicable limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 - 4 and 6 or 6C of 40 CFR, Part 60, Appendix A.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-18-24(H)]

(2) The permittee shall conduct, or have conducted, emission testing for either B005 or B006 of this emissions unit group in accordance with the following requirements:

a. The emission testing shall be conducted within the permit term but no later than 6 months prior to permit expiration or within 6 months of first firing fuel oil after permit issuance.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions and opacity.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass particulate emission rate and opacity: Methods 1 - 5 of 40 CFR, Part 60, Appendix A for particulate emissions and Method 9 of 40 CFR, Part 60, Appendix A for opacity. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]

d. The emission testing shall be conducted while the emissions unit is operating at or near its normal steam load.

e. The emission testing shall be conducted while the emissions unit is burning the worst case fuel oil.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall

describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ 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.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ 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 Cleveland DAQ.

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

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -coal fired boilers: B101, B102, B104,

EU ID	Operations, Property and/or Equipment Description
B101	228 MMBtu/Hr Chain Grate Coal Boiler. Particulate emissions are controlled with a Mechanical Dust Collector (used for district heating and cooling system) located at the Canal Road plant.
B102	228 MMBtu/Hr Chain Grate Coal Boiler. Particulate emissions are controlled with a Mechanical Dust Collector (used for district heating and cooling system) located at the Canal Road plant.
B104	228 MMBtu/Hr Chain Grate Coal Boiler. Particulate emissions are controlled with a Mechanical Dust Collector (used for district heating and cooling system) located at the Canal Road plant.

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 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(C)(1)	Particulate emissions shall not exceed 0.10 pound per mmBtu of actual heat input
c.	OAC rule 3745-18-24(G)	Sulfur dioxide (SO2) emissions shall not exceed 1.38 pounds per mmBtu of actual heat input
d.	40 CFR Part 63, Subpart DDDDD	See b)(2)a.
e.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See c)(2), d)(5), d)(6), e)(3) and e)(4) below. Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart DDDDD, after the compliance date in that rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-110-03(C)	Nitrogen oxide (NOx) emissions shall not exceed 0.30 pound per million Btu actual heat input

(2) Additional Terms and Conditions

a. On May 16, 2011, U.S. EPA decided to Stay the Boiler MACT (40 CFR Part 63, Subpart DDDDD). This delay of effectiveness will remain in place until the proceedings for judicial review are completed or U.S. EPA completes its reconsideration of the rules, whichever is earlier, and the Agency publishes a notice in the Federal Register announcing that the rules are in effect. Upon being effective, this emissions unit will be subject to 40 CFR Part 63, Subpart DDDDD.

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

c. The continuous opacity monitoring system consists of all the equipment used to acquire data and record opacity.

c) Operational Restrictions

(1) The quality of the coal received for burning in this emissions unit shall have a sulfur content, ash content and heat content sufficient to comply with the allowable emission limitations in b)(1) above.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-04(D)]

(2) The pressure drop across the mechanical dust collector shall be maintained within the range of 3.25 to 4.75 inches of water while the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64]

d) Monitoring and/or Recordkeeping Requirements

(1) The permitteeor coal supplier shall collect a representative sample of each shipment of coal which is received for burning in this emissions unit. The coal sampling shall be

performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D)]

(2) The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D)]

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

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

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

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

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

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

b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;

d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;

e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,

f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 60.7]

(5) The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the mechanical dust collector while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the mechanical dust collector on a once per shift basis (no less than 3 times per 24 hour period).

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

(6) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop range for the mechanical dust collector system.

The CAM performance indicator range as measured by the mechanical dust collector pressure drops is specified in c)(2). When the pressure drops are outside of the indicator range specified in c)(2), corrective action (including, but not limited to, an evaluation of the emissions unit and the control device) in accordance with the facility Operations and Maintenance Plan (O&M Plan) will be required.

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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly reports to the Cleveland Division of Air Quality (Cleveland DAQ) concerning the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average ash content (percent) of the coal received;

c. the average sulfur content (percent) of the coal received;

d. the average heat content (Btu/pound) of the coal received; and

e. the calculated average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) for the coal received. This calculation shall be performed using the equation specified in OAC rule 3745-18-04(F).

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the data obtained during the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D)]

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

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Cleveland DAQ, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.

b. These quarterly reports shall be submitted by January 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 opacity monitor;

iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total operating time (hours) of the emissions unit;

vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;

vii. the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;

viii. the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and

ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 60.7]

(3) The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Cleveland DAQ that identify all periods of time when the recorded pressure drop data taken across the mechanical dust collector during each 24-hour period did not comply with the allowable range specified above.

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

(4) If the results of monitoring or record keeping data indicate that the particulate emission limitations may have been exceeded, the permittee shall submit the results of that data, and document any corrective action taken to restore operation of the emissions unit, or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing

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

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

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the methods and procedures specified in USEPA Reference Method 9.

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

b. Emission Limitation:

Particulate emissions shall not exceed 0.10 pound per mmBtu of actual heat input.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the particulate emission limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9) and f)(2).

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

c. Emission Limitation:

Sulfur dioxide (SO2) emissions shall not exceed 1.38 pounds per mmBtu of actual heat input.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the sulfur dioxide emission limitation above based on the monitoring and record keeping requirements in d)(1), d)(2) and the reporting requirements in e)(1)of this permit. The sulfur dioxide emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 - 4 and 6 or 6C of 40 CFR, Part 60, Appendix A.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-18-24(G)]

d. Emission Limitation -
Nitrogen oxide (NOx) emissions shall not exceed 0.30 pound per mmBtu actual heat input.

Applicable Compliance Method:
Compliance shall be based upon the results of the emission testing specified in f)(2). The emission testing shall be performed in accordance with the requirements of OAC rule 3745-110-05.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-05]

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

a. The emission testing shall be conducted once per heating season to demonstrate compliance with the allowable mass emission rate for particulates.

b. The emission testing shall be conducted within 6 months prior to permit expiration to demonstrate compliance with the allowable mass emission rate for NOx.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A for particulates and Method 7, 7A, 7C, 7D or 7E of 40 CFR Part 60, Appendix A for NOx. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]

d. The emission testing shall be conducted while the emissions unit is operating at or near its normal steam load.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ 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.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ 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 Cleveland DAQ.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-05]

g) Miscellaneous Requirements

(1) None.