



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

2/21/2012

Certified Mail

Jim Stice
DP&L, Killen Generating Station
14869 U.S. Route 52
Manchester, OH 45144

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0701000060
Permit Number: P0106613
Permit Type: Initial Installation
County: Adams

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Portsmouth City Health Dept., Air Pollution Unit. 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.

Sincerely,

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

Cc: U.S. EPA
Portsmouth; Kentucky; West Virginia



Response to Comments

Facility ID:	0701000060
Facility Name:	DP&L, Killen Generating Station
Facility Description:	Electric Generating Station
Facility Address:	14869 U.S. Route 52 Manchester, OH 45144 Adams County
Permit:	P0106613, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Peoples Defender on 01/04/2012. The comment period ended on 02/03/2012.	
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: DP&L comments from Gary Bramble sent 02/03/2012.

- a. Comment: Page 14 of 27 – at the top of this page and a few other places the term “cellulosic” is misspelled as “cellulostic”. Please correct where this occurs.

Response: The typos have been corrected.

2. Topic: DP&L comments from Gary Bramble sent 02/03/2012.

- a. Comment: Page 14 of 27 - the temporary system has a control measure of “There shall be no visible PE except for one minute during any 60-minute period.” This is unduly stringent for a temporary system. Please drop or relax this condition.
- b. Response: This language is currently BAT for this source and will remain unchanged.

3. Topic: DP&L comments from Gary Bramble sent 02/02/2012.

- a. Comment: Page 17 of 27 – (Monitoring and Recordkeeping) deal with an operating baghouse. Conditions d)(2)(3) and (4) are excessive and redundant. Having a properly installed bag house with continuously monitored pressure drop is more than adequate for this emission source. Please delete the daily stack visual checks specified in d)(2) and the related reporting on page

19 of 27.

- b. Response: Review of other permits has found this language consistent with what is required for emissions units utilizing a baghouse for control and will remain unchanged.

4. DP&L comments from Gary Bramble sent 02/03/2012.

- a. Comment: Page 20 of 27 – mid-page, typo “miute”.
- b. Response: The typo has been corrected.



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
DP&L, Killen Generating Station**

Facility ID:	0701000060
Permit Number:	P0106613
Permit Type:	Initial Installation
Issued:	2/21/2012
Effective:	2/21/2012



Division of Air Pollution Control
Permit-to-Install
for
DP&L, Killen Generating Station

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. F006, Biofuel Storage and Handling 14

Authorization

Facility ID: 0701000060
Facility Description: Electric Generating Station
Application Number(s): A0038849
Permit Number: P0106613
Permit Description: Biofuel storage and material handling operations
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 2/21/2012
Effective Date: 2/21/2012

This document constitutes issuance to:

DP&L, Killen Generating Station
14869 U.S. Route 52
Manchester, OH 45144

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

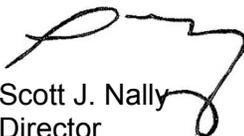
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662
(740)353-5156

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0106613
Permit Description: Biofuel storage and material handling operations

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

Emissions Unit ID:	F006
Company Equipment ID:	Biofuel Storage and Handling
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Portsmouth City Health Dept., Air Pollution Unit. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Portsmouth City Health Dept., Air Pollution Unit every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit. If no deviations occurred during a calendar quarter, the permittee shall

submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

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

records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions

1. F006, Biofuel Storage and Handling

Operations, Property and/or Equipment Description:

Biofuel Material handling and storage system including clean cellulosic biomass process building (1,500-2,000 ton storage capacity), truck tip dumping, loader access, conveying, and material handling operations controlled with a baghouse.

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	<p><u>Temporary system</u></p> <p>Fugitive particulate emissions (PE) shall not exceed 9.93 tons per year.</p> <p>Fugitive particulate emissions less than or equal to 10 microns (PM₁₀) in diameter shall not exceed 3.27 tons per year.</p> <p>Fugitive particulate emissions less than or equal to 2.5 microns (PM_{2.5}) in diameter shall not exceed 0.60 ton per year.</p> <p>There shall be no visible PE except for one minute during any 60-minute period.</p> <p><u>Permanent System</u></p> <p>PE shall not exceed 0.64 pound per hour and 2.78 tons per year from the baghouse. (stack) (It is assumed that the PE is 100% PM₁₀)</p> <p>Fugitive PE shall not exceed 1.11 tons per year. (conveyor)</p> <p>Fugitive PM₁₀ shall not exceed 0.37 ton per year. (conveyor)</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Fugitive PM _{2.5} shall not exceed 0.07 ton per year. (conveyor) See b)(2)a and b)(2)c. The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-17-07 and 3745-17-11.
b.	OAC paragraph 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(D)	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible PE from the baghouse exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to this emissions unit since the PM, PM₁₀, and PM_{2.5} limits of 9.93, 3.27 and 0.60 tpy, respectively, are less than 10 tpy.

- c. Permit to Install P0106613 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Prevention of Significant Deterioration (PSD) and Lowest Achievable Emission Rate (LAER) review:
 - i. Limiting the annual clean cellulosic biomass received to 185,500 tons, as a rolling, 12-month summation.
 - ii. Semi-enclosed building area with heavy plastic strips for access doors and all dumping areas equipped with dust pickups routed to a baghouse dust collector. Also, enclosed conveyor and partial enclosure around transfer points of permanent system.
- d. The **permanent systems** shall be installed within 12 months after commencing operation of this emissions unit.

c) Operational Restrictions

- (1) The maximum annual wood/grass briquettes, or other approved clean cellulosic biomass received shall not exceed 185,500 tons based upon a rolling, 12-month summation of the renewable fuel use.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Fuel Use (tons)</u>
1	15,500 tons
1-2	31,000 tons
1-3	46,500 tons
1-4	62,000 tons
1-5	77,500 tons
1-6	93,000 tons
1-7	108,500 tons
1-8	124,000 tons
1-9	139,500 tons
1-10	155,000 tons
1-11	170,500 tons
1-12	185,500 tons

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual renewable fuel usage limitation shall be based upon a rolling, 12- month summation of the renewable fuel usage in tons.

- (2) Clean cellulosic biomass is defined as ...forest-derived biomass (e.g., green wood, forest thinnings, clean and unadulterated bark, sawdust, trim, and tree harvesting residuals from logging and sawmill materials), corn stover and other biomass crops used specifically for energy production (e.g., energy cane, other fast growing grasses), bagasse and other crop residues (e.g., peanut shells), wood collected from forest fire

clearance activities, trees and clean wood found in disaster debris, and clean biomass from land clearing operations.

- (3) The permittee may not alter the raw material waste constituents of the manufactured wood/grass briquettes, or other approved clean cellulosic biomass without prior approval from Ohio EPA.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the wood/grass briquettes, or other approved clean cellulosic biomass fuel received for each month, in tons; and
 - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the wood/grass briquettes, or other approved clean cellulosic biomass fuel received, in tons.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative usage of wood/grass briquettes, or other approved clean cellulosic biomass, in tons, for each calendar month.

- (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 baghousestack 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 emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- (3) The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.
- (4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable

pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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

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

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

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

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

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. alleceedances of the rolling, 12-month limitation on the renewable fuel usage for this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative tons of renewable fuel.
- (2) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Portsmouth Local Air Agency by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

These reports are due by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

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

b. Emission Limitation:**Temporary System 12 months operations**

There shall be no visible PE except for one minute during any 60-minute period.

Applicable Compliance Method:

If required, compliance with the visible fugitive particulate emission limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

c. Emission Limitation:**Temporary System 12 months operations**

Fugitive PE shall not exceed 9.93 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i through iii below.

i. Biofuel Briquette Truck Unloading:

0-6 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton uncontrolled emission factor (0.18 lb/ton) from AP-42 Section 9.9.1-1 dated May, 2003 then multiplying the control efficiency (1-0.50) for the temporary building structure with wind break, divided by 2000 lbs/ton.

6-12 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton uncontrolled emission factor (0.18 lb/ton) from AP-42 Section 9.9.1-1 dated May, 2003 then multiplying the control efficiency (1-0.95) for the worst case engineering estimate of the baghouse and total enclosed building, then divided by 2000 lbs/ton.

- ii. Storage Pile Working (load in/load out):

0-6 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton uncontrolled emission factor (0.42 lb/ton) from Ohio EPA RACM Table 2.4-1 dated October, 1980 then multiplying the control efficiency (1-0.90) for all material handling inside the temporary biofuel storage building, then divided by 2000 lbs/ton.

6-12 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput (92,750 tons) by the pound per ton uncontrolled emission factor (0.42 lb/ton) from Ohio EPA RACM Table 2.4-1 dated October, 1980 then multiplying the control efficiency (1-0.95) for the worst case engineering estimate of the baghouse and total enclosed building, then divided by 2000 lbs/ton.

- iii. Biofuel Briquette Transfer and Conveying:

0-6 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton calculated uncontrolled emission factor (0.04 lb/ton) based upon no partial enclosure or covered conveyor using Ohio EPA RACM Table 2.4-1 dated October, 1980, then divided by 2000 lbs/ton.

6-12 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton calculated uncontrolled emission factor (0.04 lb/ton), then multiplying the control efficiency (1-0.70) for covered conveyor and partial enclosure using Ohio EPA RACM Table 2.4-1 dated October, 1980, then divided by 2000 lbs/ton.

d. Emission Limitation:

Temporary System 12 months operations

Fugitive PM₁₀ emissions shall not exceed 3.27 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i through iii below.

i. Biofuel Briquette Truck Unloading:

0-6 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton uncontrolled emission factor (0.059 lb/ton) from AP-42 Section 9.9.1-1 dated May, 2003 then multiplying the control efficiency (1-0.50) for the temporary building structure with wind break, divided by 2000 lbs/ton.

6-12 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton uncontrolled emission factor (0.059 lb/ton) from AP-42 Section 9.9.1-1 dated May, 2003 then multiplying the control efficiency (1-0.95) for the worst case engineering estimate of the baghouse and total enclosed building, then divided by 2000 lbs/ton.

ii. Storage Pile Working (load in/load out):

0-6 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton uncontrolled emission factor (0.14 lb/ton) from Ohio EPA RACM Table 2.4-1 dated October, 1980 then multiplying the control efficiency (1-0.90) for all material handling inside the temporary biofuel storage building, then divided by 2000 lbs/ton.

6-12 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput (92,750 tons) by the pound per ton uncontrolled emission factor (0.14 lb/ton) from Ohio EPA RACM Table 2.4-1 dated October, 1980 then multiplying the control efficiency (1-0.95) for the worst case engineering estimate of the baghouse and total enclosed building, then divided by 2000 lbs/ton.

- iii. Biofuel Briquette Transfer and Conveying:

0-6 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton calculated uncontrolled emission factor (0.013 lb/ton) based upon no partial enclosure or covered conveyor using Ohio EPA RACM Table 2.4-1 dated October, 1980, then divided by 2000 lbs/ton.

6-12 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton calculated uncontrolled emission factor (0.013 lb/ton), then multiplying the control efficiency (1-0.70) for covered conveyor and partial enclosure using Ohio EPA RACM Table 2.4-1 dated October, 1980, then divided by 2000 lbs/ton.

- e. Emission Limitation:

Temporary System 12 months operations

Fugitive PM_{2.5} emissions shall not exceed 0.60 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i through iii below.

- i. Biofuel Briquette Truck Unloading:

0-6 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton uncontrolled emission factor (0.18 lb/ton) from AP-42 Section 9.9.1-1 dated May, 2003 then multiplying the control efficiency (1-0.50) for the temporary building structure with wind break, divided by 2000 lbs/ton.

6-12 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton uncontrolled emission factor (0.18 lb/ton) from AP-42 Section 9.9.1-1 dated May, 2003 then multiplying the control efficiency (1-0.95) for the worst case engineering estimate of the baghouse and total enclosed building, then divided by 2000 lbs/ton.

- ii. Storage Pile Working (load in/load out):

0-6 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton uncontrolled emission factor (0.42 lb/ton) from Ohio EPA RACM Table 2.4-1 dated October, 1980 then multiplying the control efficiency (1-0.90) for all material handling inside the temporary biofuel storage building, then divided by 2000 lbs/ton.

6-12 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput (92,750 tons) by the pound per ton uncontrolled emission factor (0.42 lb/ton) from Ohio EPA RACM Table 2.4-1 dated October, 1980 then multiplying the control efficiency (1-0.95) for the worst case engineering estimate of the baghouse and total enclosed building, then divided by 2000 lbs/ton.

- iii. Biofuel Briquette Transfer and Conveying:

0-6 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton calculated uncontrolled emission factor (0.04 lb/ton) based upon no partial enclosure or covered conveyor using Ohio EPA RACM Table 2.4-1 dated October, 1980, then divided by 2000 lbs/ton.

6-12 months operations

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 6-months (92,750 tons) by the pound per ton calculated uncontrolled emission factor (0.04 lb/ton), then multiplying the control efficiency (1-0.70) for covered conveyor and partial enclosure using Ohio EPA RACM Table 2.4-1 dated October, 1980, then divided by 2000 lbs/ton.

- f. Emission Limitation:

Permanent System stack emissions

PE emissions from the baghouse stack serving this emissions unit shall not exceed 2.78 tons per year. (It is assumed that the PE is 100% PM₁₀)

Applicable Compliance Method:

Compliance with the 2.78 tpy shall be demonstrated by calculating the sum of i and ii below.

i. Biofuel Briquette Truck Unloading:

Compliance shall be demonstrated by multiplying the restricted annual biofuel throughput (185,500 tons) by the pound per ton uncontrolled emission factor (0.18 lb/ton) from AP-42 Section 9.9.1-1 dated May, 2003 then multiplying the control efficiency (1-0.95) for the worst case engineering estimate of the baghouse and total enclosed building, then divided by 2000 lbs/ton.

ii. Storage Pile Working (load in/load out):

Compliance shall be demonstrated by multiplying the restricted annual biofuel (185,500 tons) by the pound per ton uncontrolled emission factor (0.42 lb/ton) from Ohio EPA RACM Table 2.4-1 dated October, 1980 then multiplying the control efficiency (1-0.95) for the worst case engineering estimate of the baghouse and total enclosed building, then divided by 2000 lbs/ton.

g. Emission Limitation:**Permanent System stack emissions**

PE from the baghouse stack serving this emissions unit shall not exceed 0.64 lb/hr.

Applicable Compliance Method:

Compliance with the allowable lb/hr emission limitation shall be demonstrated by the performance testing as described in f)(2).

h. Emission Limitation:**Permanent System conveyor emissions**

Fugitive PE shall not exceed 1.11 tpy.

Applicable Compliance Method:

Biofuel Briquette Transfer and Conveying:

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 12-months (185,500 tons) by the pound per ton calculated uncontrolled emission factor (0.04 lb/ton), then multiplying the control efficiency (1-0.70) for covered conveyor and partial enclosure using Ohio EPA RACM Table 2.4-1 dated October, 1980, then divided by 2000 lbs/ton.

i. Emission Limitation:**Permanent System conveyor emissions**

Fugitive PM₁₀ emissions shall not exceed 0.37tpy.

Applicable Compliance Method:

Biofuel Briquette Transfer and Conveying:

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 12-months (185,500 tons) by the pound per ton calculated uncontrolled emission factor (0.013lb/ton), then multiplying the control efficiency (1-0.70) for covered conveyor and partial enclosure using Ohio EPA RACM Table 2.4-1 dated October, 1980, then divided by 2000 lbs/ton.

j. Emission Limitation:**Permanent System conveyor emissions**

Fugitive PM_{2.5} emissions shall not exceed 0.07 tpy.

Applicable Compliance Method:

Biofuel Briquette Transfer and Conveying:

Compliance shall be demonstrated by multiplying the potential biofuel throughput for 12-months (185,500 tons) by the pound per ton calculated uncontrolled emission factor (0.002 lb/ton), then multiplying the control efficiency (1-0.70) for covered conveyor and partial enclosure using Ohio EPA RACM Table 2.4-1 dated October, 1980, then divided by 2000 lbs/ton.

(2) Emission Testing Requirements

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

- a. the emission testing shall be conducted within 3 months after completion of the permanent material handling system while co-firing with wood/grass briquettes, or other approved clean cellulosic biomass as identified in this permit to install; unless otherwise approved by the Portsmouth Local Air Agency to coincide with the required periodic testing pursuant to the terms and conditions for this emissions unit contained in the permittee's Title V Operating Permit;
- b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, as specified in b)(1)a underpermanent system.
- c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) and emissions factors:
 - i. for PE: 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 5 and the procedures specified in OAC rule 3745-17-03(B)(9);

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

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity (250 tons/hr) feed/conveyor rate and combusting wood/grass briquettes, or other approved clean cellulosic biomass up to 5% of the lb/mmBtu capacity of the unit, or up to 8%, by weight ratio, unless otherwise specified or approved by the Portsmouth Local Air Agency.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Portsmouth Local Air Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Portsmouth Local Air Agency's refusal to accept the results of the emission test(s).
 - f. Personnel from the Portsmouth Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Portsmouth Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Portsmouth Local Air Agency.
- g) Miscellaneous Requirements
- (1) None.