



**Environmental
Protection Agency**

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

4/4/2012

Certified Mail

Kris Singleton
DP&L, O.H. Hutchings Generating Station
9200 Chautauqua Road
Miamisburg, OH 45432-4103

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0857780013
Permit Number: P0109108
Permit Type: OAC Chapter 3745-31 Modification
County: Montgomery

Yes	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
Yes	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 Regional Air Pollution Control Agency. 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
RAPCA; Indiana; Kentucky



Response to Comments

Facility ID:	0857780013
Facility Name:	DP&L, O.H. Hutchings Generating Station
Facility Description:	Electric power generating station with six electric generation units.
Facility Address:	9200 Chautauqua Road Miamisburg, OH 45432-4103 Montgomery County
Permit:	P0109108, Permit-To-Install - OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Dayton Daily News on 02/13/2012. The comment period ended on 03/14/2012.	
Hearing date (if held)	No hearing was 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: Permit Strategy write-up and permit content**

- a. Comment: Permit strategy write-up – Item 5; change 137,053 tons/year CO₂ to “CO₂e”.

Response: The typographical error has been corrected, however, the Permit Strategy write up is only issued with draft permits.

- b. Comment: Permit strategy write-up – Table 2; baseline lead emissions should be 0.012 for each unit.

Response: The typographical error has been corrected, however, the Permit Strategy write up is only issued with draft permits.

- c. Comment: • Page 1 – change \$7500 fee to \$3750 to reflect the 50% discount for natural gas provided in the OAC.

Response: ORC 3745.11(F)(1) states that “units burning exclusively natural gas, number two fuel oil, or both shall be assessed a fee that is one-half the applicable amount shown in division (F)(1) of this section.” The fee has been reduced to \$3,750.

- d. Comment: relative to tracking heat input, provide a second option for using CEMS heat input

data. Both options are important, since at some point in the future this station may use LME provisions for monitoring.

Response: The ability to use the daily heat input rate as recorded by the existing continuous emissions monitoring system (CEMS) has been added as an option for this requirement.

- e. Comment: "f." line 3 – delete "and" and the comma after "NOx".

Response: The typographical errors have been corrected.

- f. Comment: Delete the sentence that begins "If no changes..." since this type of negative declaration reporting on a quarterly basis serves no useful purpose. The potential changes envisioned by this sentence are highly unlikely

Response: This annual (not quarterly) compliance reporting requirement has not been deleted.

- g. Comment: f)(1)a. – NOx compliance should be based upon emission testing once or twice per five-year period.

Response: This term has been changed to reflect that compliance can be based on the record keeping requirements part d)(3) based on an average of the last 30 days of operation for each boiler or emissions testing. These requirements are meant for initial compliance only, ongoing compliance and the frequency of future stack tests will be addressed in the Title V Permit for O.H. Hutchings Station.

- h. Comment: (5)a. – because of the anticipated infrequent use of these boilers, please provide six months for the initial emission testing.

Response: The requested extension has been granted.

- i. Comment: because boiler use is not scheduled far in advance, please allow only 30-days notice prior to emission testing.

Response: A 60 day notice to schedule stack testing is preferred by RAPCA. However, if necessary a stack test can still be scheduled with less than 60 day notice subject to the availability of RAPCA personnel to observe the test.



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
DP&L, O.H. Hutchings Generating Station**

Facility ID: 0857780013
Permit Number: P0109108
Permit Type: OAC Chapter 3745-31 Modification
Issued: 4/4/2012
Effective: 4/4/2012



Division of Air Pollution Control
Permit-to-Install
for
DP&L, O.H. Hutchings Generating Station

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Authorization

Facility ID: 0857780013
Facility Description:
Application Number(s): A0042991
Permit Number: P0109108
Permit Description: Synthetic Minor PTI to convert two coal-fired electric generating units from coal to natural gas fuel.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$3,750.00
Issue Date: 4/4/2012
Effective Date: 4/4/2012

This document constitutes issuance to:

DP&L, O.H. Hutchings Generating Station
9200 Chautauqua Road
Miamisburg, OH 45432-4103

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

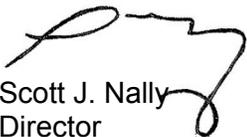
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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: P0109108

Permit Description: Synthetic Minor PTI to convert two coal-fired electric generating units from coal to natural gas fuel.

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

Group Name: natural gas units

Emissions Unit ID:	B005
Company Equipment ID:	Boiler No. 5, Unit H-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B006
Company Equipment ID:	Boiler No. 6, Unit H-6
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 Regional Air Pollution Control Agency.
 - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions,

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

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Regional Air Pollution Control Agency 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 Regional Air Pollution Control Agency 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 Regional Air Pollution Control 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.

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 Regional Air Pollution Control Agency.
- 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 Regional Air Pollution Control Agency. 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.
2. The permittee shall ensure that any emissions units subject to the Clean Air Interstate Rule (CAIR) complies/comply with the requirements of the Ohio Administrative Code (OAC) Chapter 3745-109, which includes submitting timely permit applications.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -natural gas units: B005,B006,

EU ID	Operations, Property and/or Equipment Description
B005	Natural gas fired utility boiler (Combustion Engineering); 703 MMBtu/hr maximum heat input, with low NOx burners
B006	Natural gas fired utility boiler (Combustion Engineering); 727MMBtu/hr maximum heat input, with low NOx burners

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) d)(5), d)(6), d)(7), d)(8), and e)(3).

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.	ORC 3704.03(T) Best available technology (BAT)	<u>Emissions Unit B005 and B006:</u> The nitrogen oxides (NOx) emissions from this emissions unit shall not exceed 0.15 pound per million Btu (MMBtu) actual heat input. The carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.10 pound per MMBtu actual heat input. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) as effective 11/30/01	<u>Emissions Unit B005:</u> The particulate emissions (PE) from this emissions unit shall not exceed 14.5 pounds per hour and 13.0 tons per year (PE is assumed to be equivalent to PM-10 and PM-2.5 including condensable particulate matter). The sulfur dioxide (SO ₂) emissions from this emissions unit shall not exceed 0.41 pound per hour and 0.37 ton per year. The volatile organic compound (VOC) emissions from this emissions unit shall

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>not exceed 3.79 pounds per hour and 3.41 tons per year.</p> <p><u>Emissions Unit B006:</u></p> <p>The PE from this emissions unit shall not exceed 15.0 pounds per hour and 13.5 tons per year (PE is assumed to be equivalent to PM-10 and PM-2.5 including condensable particulate matter).</p> <p>The SO₂ emissions from this emissions unit shall not exceed 0.43 pound per hour and 0.39 ton per year.</p> <p>The VOC emissions from this emissions unit shall not exceed 3.92 pounds per hour and 3.53 tons per year.</p> <p>See b)(2)b and b)(2)c.</p>
c.	OAC rule 3745-31-05(A)(3) as effective 12/01/06	<p><u>Emissions Unit B005:</u></p> <p>The PE from this emissions unit shall not exceed 14.5 pounds per hour and 13.0 tons per year (PE is assumed to be equivalent to PM-10 and PM-2.5 including condensable particulate matter).</p> <p><u>Emissions Unit B006:</u></p> <p>The PE from this emissions unit shall not exceed 15.0 pounds per hour and 13.5 tons per year (PE is assumed to be equivalent to PM-10 and PM-2.5 including condensable particulate matter).</p> <p>See b)(2)d.</p>
d.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid major new source review)	<p><u>Emissions Unit B005:</u></p> <p>See b)(2)e. and c)(1).</p> <p>The NOx emissions from this emissions unit shall not exceed 94.9 tons on a rolling 12-month basis.</p> <p>The CO emissions from this emissions unit shall not exceed 63.3 tons on a</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rolling 12-month basis. <u>Emissions Unit B006:</u> See b)(2)f. and c)(1). The NOx emissions from this emissions unit shall not exceed 98.1 tons on a rolling 12-month basis. The CO emissions from this emissions unit shall not exceed 65.4 tons on a rolling 12-month basis.
e.	OAC rule 3745-17-07(A)	Visible PE from the stack serving each emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. See b)(2)g.
f.	OAC rule 3745-17-10(B)(1)	The emissions limitation established according to this rule are less stringent than the emissions limitation established according to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-18-63(M)(1)	The emissions limitation established according to this rule are less stringent than the emissions limitation established according to OAC rule 3745-31-05(A)(3). See c)(1)
h.	OAC rule 3745-103	The emissions limitations established according to this rule are less stringent than the emissions limitations established according to OAC rules 3745-31-05(A)(3) and 3745-31-05(D).
i.	OAC rule 3745-114	d)(5), through d)(8), and e)(3)

(2) Additional Terms and Conditions

- a. The BAT determination pursuant to ORC 3704.03(T) for these emissions units include:
 - i. Use of only natural gas fuel;
 - ii. Employ low-NOx burners in each emissions unit to reduce NOx emissions to 0.15 pound per MMBtu;

- iii. Employ good combustion practices to reduce CO emissions to 0.10 pound per MMBtu.

- b. The hourly emissions limits for PE, SO₂ and VOC were established to reflect the potential to emit for each emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emissions limitations.

- c. 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.

- d. BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂ emissions from these air contaminant sources since the uncontrolled potential to emit for SO₂ is less than 10 tons/year.

This PTI for these air contaminant sources take into account the following voluntary restrictions as proposed by the permittee, for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

The voluntary cumulative heat input restrictions identified in d)(2)e. and d)(2)f will limit VOC emissions from emissions unit B005 to 3.41 tons per year and emissions unit B006 to 3.53 tons per year.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

- e. The total heat input rate for emissions unit B005 shall not exceed 1,265,400 million Btu (MMBTU) of actual heat input on a rolling 12-month basis.

To ensure enforceability during the first 12 months of operation, the permittee shall not exceed the heat input levels specified in the following table:

Maximum Allowable Heat Input Rate

Month	Cumulative Heat Input Rate (MMBTU)
1	523,032
1-2	1,046,064
1-3	1,265,400

1-4	1,265,400
1-5	1,265,400
1-6	1,265,400
1-7	1,265,400
1-8	1,265,400
1-9	1,265,400
1-10	1,265,400
1-11	1,265,400
1-12	1,265,400

After the first 12 calendar months of operation compliance with the rolling 12-month total heat input limitation shall be based upon a rolling, 12-month summation of the actual natural gas combustion rates.

- f. The total heat input rate for emissions unit B006 shall not exceed 1,308,600 MMBtu of actual heat input on a rolling 12-month basis.

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 natural gas combustion rates specified in the following table:

Maximum Allowable Heat Input Rate

Month	Cumulative Heat Input Rate (MMBtu)
1	540,888
1-2	1,081,776
1-3	1,308,600
1-4	1,308,600
1-5	1,308,600
1-6	1,308,600
1-7	1,308,600
1-8	1,308,600
1-9	1,308,600
1-10	1,308,600

1-11 1,308,600

1-12 1,308,600

After the first 12 calendar months of operation compliance with the rolling 12-month total heat input limitation shall be based upon a rolling, 12-month summation of the actual natural gas combustion rates.

- g. In accordance with OAC rule 3745-17-07(A)(3)(a)(ii) and (A)(3)(b)(ii), these emissions units do not employ control equipment for particulate emissions and are therefore exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A)(1) for a period of time not more than three hours from the moment of start up and three hours following the time of shut down.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in these emissions units.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in these emissions units.
- (2) The permittee shall install, operate, and maintain equipment to monitor and record the natural gas flow rates to these emissions units, in standard cubic feet per hour (scfh). The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with manufacturer recommendations, instructions, and operating manuals and/or the permittee's established protocols for proper operation. The flow monitoring equipment shall have an accuracy of within plus or minus five percent (5%). The monitoring device and any recorder shall be maintained in continuous operation when these emissions units are in operation, except during periods of calibration, adjustment, or repair conducted in accordance with the maintenance and calibration schedules provided by the permittee, unless otherwise specified in the applicable monitoring requirements of 40 CFR Part 60 for these emissions units.
- (3) The permittee shall collect and record the following information each day for each emissions unit:
 - a. the volume of natural gas burned, in standard cubic feet;
 - b. the heat content of the natural gas burned, in Btu per cubic foot;
 - c. The total heat input, in MMBtu [d)(3)a multiplied by d)(3)b divided by one million Btu per MMBtu] or as recorded by the existing continuous emissions monitoring system (CEMS);
 - d. emissions of NO_x in parts per million for each cycle time of the analyzer*;;
 - e. emissions of NO_x in pounds per day*;
 - f. for any day when both emissions units are in operation simultaneously;

- i. The combined total heat input for both emissions unit, in MMBtu, (the sum of the products of d)(3)c for both emissions units);
 - ii. NOx emissions from each emissions unit shall be determined by dividing the heat input rate for each emissions unit (as determined in d)(3)c.) divided by the total combined heat input rate for both emissions units (as determined in d)(3)f.i.) multiplied by the total combined NOx emissions for both emissions units (as determined in d)(3)e.).
- g. The total CO emissions in, pounds, determined by multiplying the total heat input for each day (as determined in d)(3)c.) by the emission rate, in pound CO/MMBtu heat input determined in the last stack test that showed each emissions unit was in compliance;
 - h. The NOx emissions, in pound NOx per MMBtu, [the NOx emissions from d)(3)e. or d)(3)f., divided by d)(3)c].

*These emissions units exhaust to the same stack. The existing NOx monitoring system shall be used to determine daily NOx emissions from each emissions unit.

- (4) The permittee shall maintain monthly records of the following information for each emissions unit:
 - a. the total quantity of natural gas burned in each emissions unit, each month, in million cubic feet (MMcf), in accordance with d)(2);
 - b. the average heat content, in Btu per cubic foot, of the natural gas combusted in each emissions unit;
 - c. the actual heat input, in MMBtu, for each emissions unit [(d)(4)a. multiplied by d)(4)b. divided by one million Btu per MMBtu];
 - d. 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 actual heat input, in MMBtu (the sum of the heat input records collected according to d)(4)c. for the previous 12 months);
 - e. the total NOx emissions for each month, in tons (the sum of the daily NOx emissions from d)(3)e. divided by 2,000 pounds per ton);
 - f. 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 total NOx emissions, in tons, for each emissions unit, (the sum of the NOx emissions, in tons, collected according to d)(4)e. for the previous 12 months)
 - g. the total CO emissions for each month, in tons (the sum of the daily CO emissions from d)(3)g. divided by 2000 pounds per ton);
 - h. 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 total CO emissions, in tons, for each emissions unit, (the sum of the CO

emissions, in tons collected according to d)(4)g. above for the previous 12 months).

(5) The PTI application for these emissions units, B005 and B006, was evaluated based on the actual materials and the design parameters of each emissions units exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions units, i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: n-hexane.

TLV (mg/m³): 176

Maximum Hourly Emission Rate (pounds/hour): 2.52

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 0.38
MAGLC ($\mu\text{g}/\text{m}^3$): 4,190

The permittee, has demonstrated that emissions of n-hexane, from emissions units B005 and B006, are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions units or their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of each emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in each emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the NO_x and CO emissions limitation for each emissions unit specified in b)(1)a.
 - b. all exceedances of the rolling, NO_x and CO emissions limitations for each emissions unit specified in b)(1)d.
 - c. all exceedances of the rolling, actual heat input limitations for each emissions unit specified in b)(2)e. and b)(2)f; and

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the Toxic Air Contaminate Statute, ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:
- a. the original model input;
 - b. the updated model input;
 - c. the reason for the change(s) to the input parameter(s); and
 - d. a summary of the results of the updated modeling, including the input changes; and
 - e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions units, or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

f) Testing Requirements

- (1) Compliance with the emissions limitations specified in b)(1)a. shall be determined in accordance with the following methods:
- a. Emissions Limitation –

The NO_x emissions from each emissions unit shall not exceed 0.15 pound per MMBtu actual heat input.

Applicable compliance Method –

Compliance shall be based on the record keeping requirements of d)(3)h. as an average of the the last 30 days when each boiler operated or emissions testing conducted according to U.S. EPA Reference Method 7E of 40 CFR Part 60, Appendix A.
 - b. Emissions Limitation -

The CO emissions from each emissions unit shall not exceed 0.10 pound per MMBtu actual heat input.

Applicable compliance Method –

Compliance shall be based on emissions testing conducted according to U.S. EPA Reference Method 10 of 40 CFR Part 60, Appendix A.
- (2) Compliance with the emissions limitations specified in b)(1)b. and b)(1)c. shall be determined in accordance with the following methods:

a. Emissions Limitation –

The PE from emissions unit B005 shall not exceed 14.5 pounds per hour and 13.0 tons per year (PE is assumed to be equivalent to PM-10 and PM-2.5 including condensable particulate matter).

Applicable compliance Method –

Compliance shall be based on the burner design specification of 0.015 pound filterable particulate per MMBtu multiplied by the maximum heat input rate of 703 MMBtu per hour, plus the emission factor of 0.0056 pound condensable particulate matter per MMBtu (U.S. EPA, AP-42, Section 1.4, Table 1.4-2) multiplied by the maximum heat input rate of 703 MMBtu.

If requested, compliance shall be based on emissions testing based on U.S. EPA Reference Method 5 of 40 CFR Part 60, Appendix A, U.S. EPA Reference Method 202 of 40 CFR Part 51 Appendix M and OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be based on the burner design specification of 0.015 pound filterable particulate per MMBtu plus the emission factor of 0.0056 pound condensable particulate matter per MMBtu multiplied by the actual heat input rate for each year, in MMBtu, and divided by 2,000 pounds per ton.

b. Emissions Limitation –

The SO₂ emissions from emissions unit B005 shall not exceed 0.41 pound per hour and 0.37 ton per year.

Applicable compliance Method –

Compliance shall be based on the emission factor (AP-42, Section 1.4, Table 1.4-2) of 0.00059 pound per MMBtu multiplied by the maximum heat input rate of 703 MMBtu per hour.

If requested, compliance shall be based on emissions testing based on U.S. EPA Reference Method 6 of 40 CFR Part 60, Appendix A.

Compliance with the annual SO₂ limitation shall be based on the emission factor (AP-42, Section 1.4, Table 1.4-2) of 0.00059 pound per MMBtu multiplied by the actual heat input rate for each year, in MMBtu, and divided by 2,000 pounds per ton.

c. Emissions Limitation –

The VOC emissions from emissions unit B005 shall not exceed 3.79 pounds per hour and 3.41 tons per year.

Applicable compliance Method –

Compliance shall be based on the emission factor (AP-42, Section 1.4, Table 1.4-2) of 0.0054 pound VOC per MMBtu multiplied by the maximum heat input rate of 703 MMBtu per hour.

If requested, compliance shall be based on emissions testing based on U.S. EPA Reference Method 25 of 40 CFR Part 60, Appendix A.

Compliance with the annual VOC limitation shall be based on the emission factor (AP-42, Section 1.4, Table 1.4-2) of 0.0054 pound VOC per MMBtu multiplied by the actual heat input rate for each year, in MMBtu, and divided by 2,000 pounds per ton.

d. Emissions Limitation –

The PE from emissions unit B006 shall not exceed 15.0 pounds per hour and 13.5 tons per year (PE is assumed to be equivalent to PM-10 and PM-2.5 including condensable particulate matter).

Applicable compliance Method –

Compliance shall be based on the burner design specification of 0.015 pound filterable particulate per MMBtu multiplied by the maximum heat input rate of 727 MMBtu per hour, plus the emission factor of 0.0056 pound condensable particulate matter per MMBtu (U.S. EPA, AP-42, Section 1.4, Table 1.4-2) multiplied by the maximum heat input rate of 727 MMBtu.

If requested, compliance shall be based on emissions testing based on U.S. EPA Reference Method 5 of 40 CFR Part 60, Appendix A, U.S. EPA Reference Method 202 of 40 CFR Part 51 Appendix M and OAC rule 3745-17-03(B)(9).

Compliance with the annual PE limitation shall be based on the burner design specification of 0.015 pound particulate per MMBtu plus the emission factor of 0.0056 pound condensable particulate matter per MMBtu multiplied by the actual heat input rate for each year, in MMBtu, and divided by 2,000 pounds per ton.

e. Emissions Limitation –

The SO₂ emissions from emissions unit B006 shall not exceed 0.43 pound per hour and 0.39 ton per year.

Applicable compliance Method –

Compliance shall be based on the emission factor (AP-42, Section 1.4, Table 1.4-2) of 0.00059 pound SO₂ per MMBtu multiplied by the maximum heat input rate of 727 MMBtu per hour.

If requested, compliance shall be based on emissions testing based on U.S. EPA Reference Method 6 of 40 CFR Part 60, Appendix A.

Compliance with the annual SO₂ limitation shall be based on the emission factor (AP-42, Section 1.4, Table 1.4-2) of 0.00059 pound SO₂ per MMBtu multiplied by the actual heat input rate for each year, in MMBtu, and divided by 2,000 pounds per ton.

f. Emissions Limitation –

The VOC emissions from emissions unit B006 shall not exceed 3.92 pounds per hour and 3.53 tons per year.

Applicable compliance Method –

Compliance shall be based on the emission factor (AP-42, Section 1.4, Table 1.4-2) of 0.0054 pound VOC per MMBtu multiplied by the maximum heat input rate of 727MMBtu per hour.

If requested, compliance shall be based on emissions testing based on U.S. EPA Reference Method 25 of 40 CFR Part 60, Appendix A.

Compliance with the annual VOC limitation shall be based on the emission factor (AP-42, Section 1.4, Table 1.4-2) of 0.0054 pound VOC per MMBtu multiplied by the actual heat input rate for each year, in MMBtu, and divided by 2,000 pounds per ton.

(3) Compliance with the emissions limitations specified in b)(1)d. shall be determined in accordance with the following methods:

a. Emissions Limitation –

The NO_x emissions from emissions unit B005 shall not exceed 94.9 tons on a rolling 12-month basis.

Applicable compliance Method –

Compliance shall be based on the record keeping requirements of d)(4).

b. Emissions Limitation -

The CO emissions from emissions unit B005 shall not exceed 63.3 tons on a rolling 12-month basis.

Applicable compliance Method –

Compliance shall be based on the record keeping requirements of d)(4).

c. Emissions Limitation –

The NO_x emissions from emissions unit B006 shall not exceed 98.1 tons on a rolling 12-month basis.

Applicable compliance Method –

Compliance shall be based on the record keeping requirements of d)(4).

d. Emissions Limitation -

The CO emissions from emissions unit B006 shall not exceed 65.4 tons on a rolling 12-month basis.

Applicable compliance Method –

Compliance shall be based on the record keeping requirements of d)(4).

(4) Compliance with the emissions limitations specified in b)(1)e. shall be determined in accordance with the following methods:

a. Emissions Limitation –

Visible PE from the stack serving each emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable compliance Method –

If requested, compliance shall be based on emissions testing based on U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A and OAC rule 3745-17-03(B).

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

a. The emission testing shall be conducted within six months after completion of the conversion from coal to natural gas.

b. The emission testing shall be conducted to demonstrate compliance with the 0.15 pound NO_x and 0.10 pound CO per MMBtu heat input emissions limitations.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

U.S. EPA Reference Methods 1 through 4, 7E and 10 of 40 CFR Part 60 Appendix A.

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

d. The tests shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is

deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the personnel who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency

g) Miscellaneous Requirements

- (1) None.