



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

3/1/2013

Certified Mail

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

Facility ID: 0701000060
Permit Number: P0091217
County: Adams

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

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 10/3/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

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

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

and Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

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

Cc: Portsmouth City Health Dept., Air Pollution Unit



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:	P0091217, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Peoples Defender on 10/17/2012. The comment period ended on 11/16/2012.	
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: Comments from USEPA Region V

a. **Comment:** Condition C. 1 (b)(2)n on pages 26 and 27 states that, in light of uncertainties regarding the expected carbon monoxide (CO) emissions from coal-fired utility boilers, the permittee may petition the Director of Ohio EPA to change the Best Available Technology CO limits after completing initial testing and six months of continuous emissions monitoring. Please note that if the CO limit is to be changed, modifications to the Permit to Install and Title V permit must be made to reflect the change and these modifications must undergo public comment periods.

b. **Response:** Comment noted.

c. **Comment:** Condition C.2(b)(2)d on pages 55 and 56 states "U.S. EPA plans to issue a Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD in the spring of 2012." Please omit this sentence as EPA believes it is outdated and not relevant.

d. **Response:** The permit has been revised to remove the sentence.

e. **Comment:** Condition C.3(c)(5) on page 65 defines start-up as "the time necessary to bring a turbine on line from a no load condition to fully activated water injection and shall not exceed a maximum of 60 minutes." This term could allow the turbine to be operate in an extended start-up mode



by keeping the water injection, an emissions control device, offline. Please clarify this term to indicate that the water injection will be fully activated as soon as the start-up process allows.

f. **Response:** The permit has been revised to clarify the water injection shall be fully activated as soon as the start-up process allows.

g. **Comment:** For the 7.77 tons-per-year nitrous oxides emission limit at units B002 and B003, the comment in the Comments column of the Statement of Basis is worded in a way that suggests that the limit does not apply at all. Please clarify that the limit does apply until EPA approves the December 1, 2006 version of Ohio Administrative Code 3745-31-05 as part of the State Implementation Plan.

h. **Response:** Language was added to the Statement of Basis to provide clarification that the limit applies until U.S EPA approves the December 1, 2006 version of the SIP.

2. Topic: Comments from Environmental Committee of the Ohio Utility Group representing Buckeye Power, Inc., Columbus Southern Power Company (a unit of AEP), The Dayton Power and Light Company, Duke Energy Ohio, First Energy, Ohio Power Company (a unit of AEP), and Ohio Valley Electric Corporation on behalf of Shumaker, Loop, & Kendrick, LLP.

a. **Comment:** Opacity Monitors, the Opacity Limit, and Wet Scrubbed Units:

Ohio EPA must address the requirement to install and operate COMs and certify compliance with the opacity emission limit in scrubbed units. Killen is a Subpart D unit, so specific legal requirements are slightly different than other units which are only subject to Chapter 3745-17 of the Ohio Administrative Code, but the basic underlying problem is the same. COMs have no practical application for determining or monitoring opacity emissions on scrubbed units.

Killen has a COM in the stack, located behind its wet scrubber. The COM is certified to measure opacity emissions only when the scrubber is NOT being used, which is only during the start up/shut down phase of operation. Consequently, the COM can take readings only during a time when the opacity limit is not in effect. The remainder of operating time, when the scrubber is running, the stack is filled with moisture from the scrubber, making any reading from the COM useless (the COM is not certified to operate in a wet environment and will render reading at or near 100% because of the water vapor present). The permit requires DP&L to certify, operate and maintain a COM that cannot take a reading during operations when the opacity limit applies and can only take a reading during operations (start up/shut down) when the limit does not apply.

In addition to the senseless requirement for DP&L to have a COM, Ohio EPA has further exacerbated the problem by mandating a full set of record keeping and reporting requirement for the COM data. DP&L is required to maintain and report all violations of the limit, as well as detailed reports as to the length and severity of the "events" and the "steps taken" to address the exceedances. Why?

Any exceedance recorded during start up/shut down cannot be a violation of the limit as the limit doesn't apply during this event. Any readings taken during operation when the scrubber is working? These almost always show exceedances near 100% opacity because the water vapor present. The COM is not certified to operate in these conditions and the readings are invalid.

Finally, the Testing Requirements section of the permit inaccurately states that compliance with the opacity limit will be met through the data collection requirements of the monitoring section. This is patently false. All of the readings taken by the device are legally useless as regards compliance.



Ohio EPA must revise the permit to address these issues. The Killen Station has PM CEM that monitors the actual PM emissions (which, when the scrubber is operating, are 10% to 20% of the allowable emission limit.) The entire purpose of the opacity limit is to serve as an indicator of ESP performance which, in turn, can be used to determine when it may be appropriate to conduct stack tests to determine compliance with the PM limit. As Killen monitors PM emissions directly, the entire premise for measuring opacity no longer exists. There is simply no valid reason for requiring a COM and the detailed reporting in the permit.

There is even less reason to require additional Method 9 reading on top of the COM. The permit requires DP&L to additionally conduct Method 9 readings every month for at least 6 months (and then only allows DP&L to petition to have the frequency reduced). There is simply no lawful or reasonable clear basis for requiring Method 9 readings from a unit that has a PM CEM. Ohio law is very clear that a source may emit at any opacity level so long as it can demonstrate compliance with the underlying PM limit. What purpose will Method 9 readings serve under any circumstance? In most cases, proper, accurate reading will be unattainable because of the wet plume. In most instances when a reading can be made, the unit will be in compliance because of the high removal of particulate by the wet scrubber. And in the event of non-compliant opacity reading? If the PM COM shows the unit in compliance with the PM limit, the Method 9 violation is practically enforceable. Like data from the COM, the Method 9 data is useless. The requirement to take readings is unlawful and unreasonable.

Ohio EPA should revise the permit to eliminate the requirement to operate the COM. Further, even if the COM "requirement" stays in the permit, the Agency should revise all of the monitoring and reporting requirements so as to eliminate the collection and reporting of meaningless data that Ohio EPA cannot possibly want or use. Finally, the requirement to conduct Method 9 readings should be revised to be done only when "requested" by Ohio EPA, not on a monthly basis.

b. Response: OAC rule 3745-17-03(C) requires that any facility subject to 40 CFR Part 51, Appendix P, operate and maintain a COMS, and that the system meet requirements set forth in 40 CFR Part 60, Appendix B. 40 CFR 60.42(a) further states that ANY gases from an emissions unit subject to this Subpart, and that exhibits greater than 20% opacity, except for one 6-minute period per hour of not more than 27% opacity, is in violation of the Subpart. Although Ohio EPA recognizes that opacity cannot be measured in a wet plume, it is accepted by USEPA and Ohio EPA that if opacity is required to be monitored at the point where emissions are discharged to the atmosphere, and water droplets are present, the opacity may be monitored at a location upstream of the interference (the FGD), providing that the location is still able to meet the COMS siting requirements contained in 40 CFR Part 60, Appendix B.

In this case the FGD was installed in a location where any upstream COMS installation location would not be able to meet siting requirements. This being the case, the COMS was installed in the wet stack, and provides opacity readings when the FGD is not in use, but it is not able to monitor opacity when the FGD is in use because of water droplet interference. Ohio EPA does recognize that a PM monitor has been installed, certified, and is being used to demonstrate ongoing compliance with particulate emissions limitations for this emissions unit, and that 40 CFR Part 60, in this case, would eliminate both the opacity limit, and the opacity monitoring requirement. Ohio EPA is working on a rule change that will address situations such as this, but since the current rule does not contain alternate monitoring provisions, or exemptions from monitoring opacity even from wet stack, an exclusion from monitoring opacity is not possible at this time. Once the rules are approved in Ohio's SIP then DP&L may petition the Director to remove the COM requirements which is spelled out in section d)(4) of the permit.

Per correspondence dated August 2, 2006, USEPA, Region V states "since the opacity limit at 40 CFR 60.42(b) is an independently enforceable limit, we recognize it will be the responsibility of DP&L to



demonstrate compliance with the opacity limit for purposes of 40 CFR Part 60, Subpart D, even with the installation of a PM CEMS. To address this requirement, we will allow DP&L to demonstrate compliance with the opacity limit at 40 CFR 60.42 by using visible emissions readings conducted in accordance with 40 CFR Part 60, Appendix A, Method 9 (M9).

As stated in draft term and condition d)(8)c, DP&L may petition the Director of Ohio EPA and USEPA for a reduction in the frequency of Method 9 readings. Therefore, this request cannot be approved with this pending final permit action and must be submitted as a separate request to both Ohio EPA and USEPA, Region V.

c. Comment: Section B. Facility-Wide Terms and Conditions:

The Utilities object to B.11, (page 18 of 118) which addresses the application of the CAIR program. The permit should only reference the applicable rules still in effect that apply to the facility at this time. The explanation of the “history” of the rule, including the Transport Rule and its litigation, is unnecessary. Chapter 3745-109 of the Ohio Administrative Code is still in effect and the permit should reference only those active requirements without the extended narrative. Further, the listing of the allocated CAIR allowances is unnecessary and misleading. The allowances are significant of nothing; they are not a limit or a requirement. Ohio EPA should delete the table of allocations and simply reference the appropriate regulation.

d. Response: The permit has been revised to remove term and condition B.11.b) which includes the table of allocations. The paragraph which explains the history of the rule is identified as a note, so that anyone (including the public) will be aware that CAIR requirements will likely cease to be effective and be replaced during the effective dates of the Title V permit. No other changes have been made, other than to delete the allowance table.

e. Comment: Section C. Emissions Unit Terms and Conditions:

Subsection 1.b)(1) states the applicable emissions limits for unit B001 (page 21 of 118). This table includes reference to 40 CFR Part 63, Subpart UUUUU (the MATS rule). The table is misleading in its current form. The limits in the MATS rule do not take effect until April 16, 2015. As written, the draft permit would apply the new rule upon issuance. Ohio EPA should revise the table to make the limits applicable upon the effective date of the rule, either April 16, 2015, or such other date as a court may impose. (The rules are under appeal and may be subject to stay or vacatur; the permit should allow for these contingencies).

f. Response: The effective date of April 16, 2015 has been added to the applicable requirements table in C.1.b)(1).

g. Comment: Subsection 1.d)(4)c.-f.(page 30 of 118) addresses monitoring and/or record keeping requirements for B001. Specifically, it requires record keeping of the operation of control equipment. This is a new requirement and unreasonable. There is no basis for requiring a permittee to monitor and record the operation of control equipment, particularly since the operation restriction “requiring” its operation is unlawful. These units have emission limits with which they must comply. Ohio EPA has no authority to dictate by what means a facility must do so. Requiring the record keeping of control operations creates a new burden that cannot be justified.

h. Response: The CEMS monitoring and/or record keeping language is boiler plate language from the Ohio EPA Permit Terms and Conditions Library and was established as federally enforceable in PTI P0106805 modification permit which was issued final for emission unit B001 on 12/29/10.



i. **Comment:** Subsection 1.(f) Testing Requirements contains multiple references to demonstrating “ongoing” compliance with PM, NO_x, and SO₂ limits (pages 48 and 49 of 118). A demonstration of “on going compliance using CEMs is a departure from the wording of the original permit and is a misuse of the CEMs under Ohio law. Under the Ohio SIP, compliance with an emission limit is demonstrated by use of the reference method test outlined for the specific pollutant. The CEMs can be used to monitor ongoing compliance but not to determine compliance. *Dayton Power & Light Company v. Jones*, ERAC No. 574950, 2003 WL 22908203, ¶28, FN 20. Ohio EPA should revise the permit to reflect the language used in the original permit.

j. **Response:** Ohio EPA and USEPA, Region V view CEMS data as a direct measurement of emissions which will be available for determining compliance with the limitations established in the permit on an ongoing basis.

k. **Comment:** Subsection 2. Applicable Emission Limits (page 55 of 118) lists the industrial boiler MACT as an applicable requirement. It includes a parenthetical alluding to the current reconsideration of the rule by U.S. EPA. The permit should more explicitly state that the rule will not apply if U.S. EPA (or a court) changes, stays, or vacates the rule.

l. **Response:** On December 20, 2012, U.S. EPA finalized adjustments to the industrial boiler MACT standards, originally finalized in March, 2011. Once the amendments to this rule are published in the federal register, the applicable compliance date will be added to the applicable requirements table in C.2.b)(1), prior to final issuance. Term and condition C.2.b)(2)d which referenced the reconsideration has been removed.

3. Topic: Comments from Dayton Power & Light.

a. **Comment:** Statement of Basis:

In Section C. Emission Unit Terms and Conditions, it is correctly stated that carbon monoxide and VOC limits apply only when clean cellulosic biomass is co-fired. This is correct and DP&L appreciates the additional citations throughout this permit, where appropriate.

b. **Response:** No response necessary.

c. **Comment:** Section B: Facility-Wide Terms and Conditions: Clean Air Interstate Rule (CAIR)

In item 11, there is a table of NO_x allowances. This a trading program and the values in this table are not limits. It is inappropriate to include these values in the permit. DP&L requests that the table be deleted.

d. **Response:** See response to comment 2.d. above.

e. **Comment:** Section C.: Emissions Unit Terms and Conditions : B001, Boiler No. 2:
40 CFR Part 63, Subpart UUUUU, National Emissions Standards for Hazardous Air Pollutants from Coal and Oil-Fired Electric Utility Steam Generating Units: B001 (MATS):

The effective date for MATS limits is April 16, 2015. It is unclear in Section 1 b)(1)m. (page 22&23) that DP&L is not subject to these limits until the effective date. Testing Requirements in Section 1 f)(1)h on page 49-50 and f)(5) also include a citation to the MATS rule without a reference to the effective date of the limits.



f. Response: The effective date of April 16, 2015 has been added to the applicable requirements table in C.1.b)(1).

g. Comment: COMS: Section b)(2)j., k., l. on page 26 and d)(4) on page 29 deal with the continuous opacity monitor (COMS) that Killen has in the wet stack. This measurement approach from the '80's has been supplanted by a modern particulate continuous emission monitor (CEMS). The COMS is of no value in a wet stack, downstream of the FGD. We request, once again, that this COMS requirement be dropped.

h. Response: See response to comment 2.b above.

i. Comment: COMS: Section d)(4) c.-f. (page 30 of 118) addresses monitoring and/or record keeping requirements for B001. Specifically, it requires record keeping of the operation of control equipment by the COM. This is a new requirement and unreasonable. There is no basis for requiring a permittee to monitor and record the operation of control equipment. These units have emission limits with which they must comply. Ohio EPA has no authority to dictate by what means a facility must do so. Requiring the record keeping of control operations creates a new burden that cannot be justified.

j. Response: See response to comment 2.j above.

k. Comment: COMS: Method 9 readings in d)(7) are an unnecessary burden. Killen continuously operates both a COM and a PM CEMs, and is required to report all hours of monitoring data. Therefore, Killen is continuously monitoring both opacity and PM, and the Method 9 serves no purpose. It can actually cause added confusion if the PM CEMs data conflicts with the Method 9 results. Subsection d)(7) page 31 – Killen has performed periodic Method 9 readings for more than four years, and has demonstrated compliance for 15 consecutive months. (See OUG comments for supporting legal discussion).

m. Response: See response to comment 2.b above.

n. Comment: Startup and Shutdown: Section 1 d)(5) on page 30 deals with startup and shutdown. The ESPs at Killen Station are considered operational when the flue gas reaches 500°F. The ESPs are essentially systems composed of metal and function as a heat "sink" until the metal is evenly heated and condensation is eliminated. The Killen air permits have historically included language acknowledging the previously approved startup and shutdown temperatures associated with the Killen Station unit B001. The Ohio regulations provide for an alternative temperatures for startup and shutdown in 3745-17-07(A)(3)(a)(ii) and (b)(i) "the director may incorporate a higher startup temperature in the permit or variance for such source for which an applicant demonstrates to the satisfaction of the director that the higher temperature is needed for safety considerations or to prevent damage to control equipment." DP&L requests that the alternate higher temperature values for startup (500 °F) and shutdown (600 °F) of our current Title V permit be restored.

o. Response: The permit has been revised to add "sunset language" adding the alternative temperatures for startup (500 °F) and shutdown (600 °F) which clarifies the alternate temperature exemptions for start-up and shutdown shall be effective and federally enforceable on the date U.S.EPA approves the alternate temperature exemption levels as a revision to the Ohio SIP for particulate matter.

p. Comment: Monitoring Hours of Control Equipment: Section d)(10), d)(12), and d)(13) (pages 32-34 of 118) addresses monitoring and/or record keeping requirements for B001. Specifically it requires



record keeping of the operation of control equipment by continuous emissions monitoring systems. This is a new requirement that is unreasonable and is particularly confusing when there is more than one control system.

There is no basis for requiring a permittee to monitor and record the operation of control equipment. These units have emission limits with which they must comply. Ohio EPA has no authority to dictate by what means a facility must do so. Requiring the record keeping of control operations creates a new burden that is not justified.

q. Response: See response to comment 2.h above.

r. Comment: Testing Requirements: Section 1.f) Testing Requirements contains multiple references to demonstrating “ongoing” compliance with PM, NO_x, and SO₂ limits (pp. 47-49 of 118). A demonstration of “ongoing” compliance using CEMs is a departure from the wording of the original permit and is a misuse of the CEMs under Ohio law. Under the Ohio SIP, compliance with an emission limit is demonstrated by use of the reference method test outlined for the specific pollutant. The CEMs can be used to monitor ongoing compliance, but not to determine compliance (see Stuart decision). Ohio EPA should revise the permit to reflect the language used in the original permit.

As a related comment, the limits on page 21 of 118 do not reflect a 3-hour averaging time or other longer averaging time. We reject any inference that these are one-hour or shorter limits.

s. Response: See response to comment 2.j above.



PRELIMINARY PROPOSED

Division of Air Pollution Control Title V Permit for DP&L, Killen Generating Station

Facility ID:	0701000060
Permit Number:	P0091217
Permit Type:	Renewal
Issued:	3/1/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
DP&L, Killen Generating Station

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Preliminary Proposed Title V Permit

DP&L, Killen Generating Station

Permit Number: P0091217

Facility ID: 0701000060

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0701000060
Facility Description: Electric Generating Station
Application Number(s): A0022578, A0022579, A0043475
Permit Number: P0091217
Permit Description: Title V Renewal permit for Killen Electric Generating Station located in Adams County. Killen is an existing 600 MW coal-fired electric generating station which commenced operation in 1982.
Permit Type: Renewal
Issue Date: 3/1/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0091215

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Preliminary Proposed Title V Permit
DP&L, Killen Generating Station
Permit Number: P0091217
Facility ID: 0701000060
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

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

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

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



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

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

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

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

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

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

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

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



measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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



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

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

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

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

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

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

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

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Portsmouth City Health Dept., Air Pollution Unit.

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

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



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the



Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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



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

11. Reopening for Cause

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.



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DP&L, Killen Generating Station

Permit Number: P0091217

Facility ID: 0701000060

Effective Date: To be entered upon final issuance

- (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (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.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. An identification of each term or condition of this permit that is the basis of the certification.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.



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

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

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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



- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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



21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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



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

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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

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



27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



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DP&L, Killen Generating Station
Permit Number: P0091217
Facility ID: 0701000060
Effective Date: To be entered upon final issuance

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 following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:

a) P001-Emergency generator- PBR 09823 issued 6/12/12

b) P002-Fire protection pump- PBR 09821 issued 6/12/12

[Authority for term: 3745-77-07(A)(13)]

3. 40 CFR Part 63, Subpart DDDDD (Boiler MACT) Requirements

The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Parts 63.7480 through 63.7575 (including the Table(s) and Appendix(ices) referenced in Subpart DDDDD).

The following emissions units in this permit are subject to the aforementioned requirements: B002 & B003.

[Authority for term: 40 CFR Part 63]

40 CFR Part 63, Subpart A, General Provisions

The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.

The following emissions units in this permit are subject to the aforementioned requirements: B002 & B003.

[Authority for term: 40 CFR Part 63]

4. The following emission unit contained in this permit is subject to 40 CFR Part 63, Subparts YYYY, & ZZZZ: B004.

The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://efcr.gpoaccess.gov> or by contacting the Portsmouth Local Air Agency.

The compression ignition (CI) reciprocating internal combustion engine(s) (RICE), greater than 2,000 brake horse power and located at a major source for hazardous air pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. The existing stationary CI RICE, B004, installed before 12/19/02, shall meet the requirements of Part 63, Subpart ZZZZ no later than 5/3/13.

[40 CFR 63.6585], [40 CFR 63.6590(a)], [40 CFR 63.6595], and [40 CFR 63.6600(d)]



5. The following emissions unit contained in this permit is not subject to 40 CFR Part 63, Subpart ZZZZ: P001.

The existing emergency or limited use compression ignition (CI) reciprocating internal combustion engine(s) (RICE), P001, installed before 12/19/02, greater than 500 brake horse power, and located at a major source for hazardous air pollutants (HAPs), is not subject to the General Provisions to 40 CFR Part 63, Subpart A, the National Emission Standards for Hazardous Air Pollutants (NESHAP) or its Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines, and no initial notification is required.

[40 CFR 63.6585], [40 CFR 63.6590(a)], and [40 CFR 63.6590(b)(3)]

6. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart ZZZZ: P002.

The existing emergency or limited use compression ignition (CI) reciprocating internal combustion engine(s) (RICE), less than or equal to 500 brake horse power and located at a major source for hazardous air pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ. The existing stationary CI RICE, P002, installed before 6/12/06, shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than 5/3/13.

[40 CFR 63.6585], [40 CFR 63.6590(a)], [40 CFR 63.6595], and [40 CFR 63.6602]

7. The Portsmouth Local Air Agency has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions unit B001. The permittee shall comply with the provisions of the plan (as specified in Part C – Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions unit.

[Authority for term: 40 CFR Part 64]

8. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart UUUUU, National Emission Standards for Hazardous Air Pollutants from Coal and oil-fired Electric Utility Steam Generating Units: B001.

The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://efcr.gpoaccess.gov> or by contacting the Portsmouth Local Air Agency.

9. The permittee shall ensure that any CAIR NO_x, SO₂, or NO_x ozone season units complies with the requirements of OAC chapter 3745-109, which includes submitting timely permit applications. The permittee shall ensure that the affected emissions units comply with those requirements as outlined in the permit application submitted as required by OAC rules 3745-109-03, 3745-109-10 and 3745-109-16 for the affected emissions units.

The permittee shall also comply with any subsequent federally mandated programs that may replace the CAIR program affecting electric generating facilities (see note in paragraph 11.a).

Note: Ohio EPA DAPC has completed proposed rule amendments for OAC chapter 3745-14, specifically, OAC rule 3745-14-01 and OAC rule 3745-14-06, which facilitated the transition of the affected units from OAC chapter 3745-14 into the federal Clean Air Interstate Rule (CAIR) program



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which began with the 2009 control periods. This began the process of “sunsetting” the parts of OAC chapter 3745-14 which were no longer needed as a result of Ohio’s CAIR rules (OAC chapter 3745-109).

On July 6, 2010, US EPA announced the proposed CAIR replacement rule, the “Transport Rule” as required by the original court vacatur of the federal CAIR program in July 2008. The current time frame for the requirements of this program, as far as new state emission budgets, was to begin with the 2012 control periods, but has now been delayed as a result of a stay of Cross State Air Pollution Rule (CSAPR) by the courts on December 30, 2011 and the subsequent court ruling vacating CSAPR on August 21, 2012.. The CAIR allowances for affected units and requirements of the CAIR will continue for the 2012 control periods and pending the promulgation of a valid replacement.

[Authority for term: OAC rules 3745-109 and 3745-77-07(A)(5)]



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C. Emissions Unit Terms and Conditions



1. B001, Boiler No. 2

Operations, Property and/or Equipment Description:

Babcock and Wilcox pulverized coal-fired, dry bottom, wall-fired utility boiler having a nominal capacity of 5,928 MMBtu/hr and controlled with an electrostatic precipitator (ESP), selective catalytic reduction (SCR), and flue gas desulfurization (FGD) scrubber with the capability to burn renewable fuel (wood/grass briquettes, or other approved clean cellulosic biomass) with renewable fuel combustion comprising up to 5 pct. of total heat input (296.4 MMBtu/hr) or up to 8% weight ratio of total fuel input and restricted to 185,500 tons annually.

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) b(2)r., d)(6), d)(18), d)(19), d)(20), and e)(14)

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.	40 CFR Part 60, Subpart D (40 CFR Part 60.42(a)(2))	Any gases discharged into the atmosphere from this emissions unit shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.
b.	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60.42(a)(2). See (2)r and d)(6).
c.	OAC rule 3745-17-10(C)(1) and 40 CFR Part 60, Subpart D (40 CFR Part 60.42(a)(1))	Particulate emissions (PE) shall not exceed 0.10 lb/mmBtu of actual heat input.
d.	OAC rule 3745-18-07(C) and 40 CFR Part 60, Subpart D (40 CFR Part 60.43(a)(2))	Sulfur dioxide (SO ₂) emissions shall not exceed 1.2 lbs/mmBtu of actual heat input.
e.	40 CFR Part 60, Subpart D (40 CFR Part 60.44(a)(3))	Nitrogen oxides (NO _x) emissions shall not exceed 0.70 lb/mmBtu of actual heat input.
f.	OAC rule 3745-31-05(A)(3) (PTI 07-354 issued 1/20/1994)	The controlled PE from the chemical cleaning and evaporation process shall not exceed 0.73 lb/hr and 0.03 ton/year.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	OAC rule 3745-31-05(A)(3) (PTI 07-001 issued 10/09/1987)	Compliance with this rule also includes compliance with OAC rules 3745-17-10(C) and 3745-18-07(C), and the applicable provisions of 40 CFR Part 60, Subpart D.
h.	OAC rule 3745-31-10 through 20 (PTI P0106805 issued 12/29/2010)	When co-firing coal with wood/ grass briquettes or other approved clean cellulosic biomass: Carbon monoxide (CO) emissions from the boiler stack shall not exceed 0.15 lb/mmBtu of actual heat input (as a 24-hour average), 889.2 lbs/hr (as a 24-hour average) and 3,895 tpy. See b)(2)a, c)(1) and c)(2).
i.	ORC 3704.03(T) (PTI P0106805 issued 12/29/2010)	When co-firing coal with wood/ grass briquettes or other approved clean cellulosic biomass: Volatile organic compounds (VOC) emissions from the boiler stack shall not exceed 0.0034 lb/mmBtu of actual heat input. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through 20. See b)(2)b, c)(1) and c)(2).
j.	OAC rule 3745-114-01	See d)(18) and d)(19).
k.	OAC rule 3745-31-05(A)(3) (PTI P0106805 issued 12/29/2010)	See b)(2)c.
l.	40 CFR Part 64	See b)(2)l, b)(2)m, d)(6), d)(8), e)(3), f)(1)a and f)(2).
m.	40 CFR Part 63, Subpart UUUUU (Table 2: 40 CFR Part 63.9991) effective date of April 16, 2015. [In accordance with 40 CFR 60.9982(d), this emissions unit is an existing EGU if it is not new or reconstructed. An existing electric steam generating unit that meets the applicability requirements after the effective date of this final rule due to a change in process (e.g., fuel or	Comply with either limit: 0.03 lb/MMBtu (PM) or 0.30 lb/MWh (PM); OR 5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh of Total non-Hg HAP metals; OR Individual HAP metals: Antimony (Sb) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh. Arsenic (As) 1.1E0 lb/TBtu or 2.0 E-2



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	utilization) is considered to be an existing source under this subpart.]	lb/GWh. Beryllium (Be) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh. Cadmium (Cd) 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh. Chromium (Cr) 2.8E0 lb/TBtu or 3.0E-2 lb/GWh. Cobalt (Co) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh. Lead (Pb) 1.2E0 lb/TBtu or 2.0E-2 lb/GWh. Manganese (Mn) 4.0E0 lb/TBtu or 5.0E-2 lb/GWh. Nickel (Ni) 3.5E0 lb/TBtu or 4.0E-2 lb/GWh. Selenium (Se) 5.0E lb/TBtu or 6.0E-2 lb/GWh. Hydrogen chloride (HCl) 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh, OR Sulfur dioxide (SO ₂) 2.0E-1 lb/MMBtu or 1.5E0 lb/MWh. Mercury (HG) 1.2E0 lb/TBtu or 1.3E-2 lb/MWh.

(2) Additional Terms and Conditions

- a. Based on the “Prevention of Significant Deterioration” (PSD) analysis conducted to ensure the application of “Best Available Control Technology” (BACT), it has been determined that the following control measures constitute BACT for CO emissions from this emissions unit when co-firing wood/ grass briquettes or other approved clean cellulosic biomass:
 - i. It has been determined that the use of good combustion practices, and the emission limitations listed under OAC rules 3745-31-10 through 20 above constitutes BACT for this emissions unit.



The emission limitations based on the BACT requirements are listed under OAC rules 3745-31-10 through 3745-31-20 in b)(1)h above. The controls and practices that constitute BACT also meet the BAT requirements of ORC 3704.03(T).

- b. Compliance with ORC 3704.03(T) shall be demonstrated by the emission limitations and compliance with applicable fuel restrictions, BACT requirements, record keeping, reporting, and emissions testing required by this permit that are associated with the above ORC 3704.03(T) limitations and requirements.

The above-specified limitations under ORC 3704.03(T) represent best available technology (BAT) requirements that were triggered as a result of the New Source Review (NSR) major modification in this permit action for the renewable fuel project which increased potential emissions of CO and VOC only when co-firing coal with wood/grass briquettes, or other approved clean cellulosic biomass. BAT requirements do not apply to this existing emissions unit when firing only coal or fuel oil (for ignition and supplemental firing).

- c. OAC rule 3745-31-05(A)(3) did not apply to this modification issued 12/09/2004, based on OAC rule 3745-31-01(QQQ)(1)(b).

This permit allowed the voluntary installation of one flue gas desulfurization (FGD) scrubber unit on emissions unit B001. A permit to install was required to determine whether the air quality impacts associated with the installation of the new FGD unit exceeded the levels outlined in OAC rule 3745-31-01(QQQ)(1)(b). Because an environmentally beneficial exemption does not allow installation of a project that exceeds modeling thresholds, the installation of the scrubber required a permit to install.

- d. Once the permittee commences modification in accordance with PTI P0106805, each continuous CO monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 4 or 4a and 6. At least 45 days before commencing certification testing of the continuous CO monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of CO emissions from the continuous monitor(s), in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous CO monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR 60, or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; however, the quarterly



cylinder gas audit and relative accuracy audit frequency requirements may be adjusted to coincide with linearity checks completed for continuous emissions monitoring systems subject to 40 CFR Part 75, Appendix B requirements.

- e. The continuous CO monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
- f. The permittee shall maintain a written quality assurance/quality control plan for the continuous SO₂ monitoring system, designed to ensure continuous valid and representative readings of SO₂ emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO₂ monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous SO₂ monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

- g. The continuous SO₂ monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
- h. The permittee shall maintain a written quality assurance/quality control plan for the continuous NO_x monitoring system, designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous NO_x monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either



case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

- i. The continuous NO_x monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
- j. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
- k. The continuous opacity monitoring system consists of all the equipment used to acquire data and record opacity.
- l. The permittee shall maintain a written quality assurance/quality control plan for the continuous particulate monitoring system, designed to ensure continuous valid and representative readings of particulate matter and compliance with 40 CFR Part 60, Appendix B, Performance Specification 11. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous particulate monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous particulate monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous particulate monitoring system must be kept on site and available for inspection during regular office hours.
- m. The continuous particulate monitoring system consists of all the equipment used to acquire data and record particulate emissions.
- n. During the review of PTI P0106805, it became clear that there are significant uncertainties concerning the expected CO emissions from coal-fired utility boiler sources. These uncertainties include, but are not limited to (1) the fact that limited CO testing has been done on coal-fired utility boiler sources, (2) DP&L,



Killen Station has only conducted a trial burn at 3% biomass by weight ratio, and (3) there is limited information on the affects of biomass fuel on boiler operations and control equipment.

Because of the significant uncertainties, DP&L, Killen Station may request that the Director adjust the Best Available Control Technology (BACT) CO limit after enough data has been collected to understand the expected emissions. DP&L may petition the Director to change the limits once initial testing for CO while co-firing at 5% heat input or up to 8% weight ratio is complete and at least six months of data are collected via the CO continuous emissions monitoring system (CEMS). The Director shall consider the information contained in the permittee's petition, but is not obligated to accept the permittee's recommended BACT CO emission limitation.

- o. The permittee shall maintain a written quality assurance/quality control plan for the continuous CO₂ monitoring system, designed to ensure continuous valid and representative readings of CO₂ emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous CO₂ monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous CO₂ monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

- p. The continuous CO₂ monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
- q. Except as provided for under the Start-up, Shut-down, and Malfunction provisions of OAC rule 3745-17-07(A)(3)(a)-(c), the emissions from this emissions unit shall be vented to the ESP at all times the emissions unit is in operation.

The temperature exemptions for start-up and shutdown specified in d)(5) shall terminate on the date the U.S. EPA approves the 500 and 600 degrees Fahrenheit temperature exemptions as a revision to the Ohio SIP for particulate matter.



- r. Except as provided under the Start-up, Shut-down, and Malfunction provisions of OAC rule 3745-17-07(A)(3)(a)-(c), the emissions from this emissions unit shall be vented to the ESP at all times the emissions unit is in operation.

The temperature exemptions for start-up, and shut-down specified in d)(6) shall be effective and federally enforceable on the date U.S. EPA approves the 500 and 600 degrees Fahrenheit temperature exemption levels as a revision to the Ohio SIP for particulate matter.

The Ohio EPA and U.S. EPA recognize that ESP's equipped with a hot side electrostatic precipitator in which oil is utilized to raise the economizer outlet or electrostatic precipitator flue gas inlet temperature to 500 degrees Fahrenheit before energizing the electrostatic precipitator on start-up, and when mills are taken out of service and the temperature reaches 600 degrees Fahrenheit on a shutdown. To address this issue, the Ohio EPA recognizes that it is appropriate to allow the temperature exemptions for start-up and shutdown to occur at 500 and 600 degrees Fahrenheit rather than 250 degrees Fahrenheit as specified in the current SIP-approved version of OAC rules 3745-17-07(A)(3)(a) and (b), and has agreed to proceed with such a rule revision.

c) Operational Restrictions

- (1) The maximum annual wood/grass briquettes, or other approved clean cellulosic biomass burned in this emissions unit 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 after commencing operation in accordance with PTI P0106805, the permittee shall not exceed the operating usage 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 commencing operation in accordance with PTI P0108605, the renewable fuel usage limitation shall be based upon a rolling, 12-month summation of the renewable fuel usage in tons.

[Authority for term: P0106805 and 3745-77-07(A)(1)]



- (2) The actual heat input from the co-firing of wood/grass briquettes, or other approved clean cellulosic biomass shall not exceed 5% of the emissions unit's actual total heat input, and up to 8% weight ratio on a daily average basis.

[Authority for term: P0106805 and 3745-77-07(A)(1)]

- (3) The permittee shall combust only coal, distillate fuel oil and/or biodiesel (B20) or less [for ignition and supplemental firing], and wood/grass briquettes, or other approved clean cellulosic biomass in this emissions unit. 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.

[Authority for term: P0106805 and 3745-77-07(A)(1)]

- (4) 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.

[Authority for term: P0106805 and 3745-77-07(A)(1)]

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 use for each month, in tons; and
 - b. beginning after the first 12 calendar months of commencing operation in accordance with PTI P0106805, the rolling, 12-month summation of the wood/grass briquettes, or other approved clean cellulosic biomass fuel use, in tons.

Also, during the first 12 calendar months after commencing operation in accordance with PTI P0106805, the permittee shall record the cumulative usage of wood/grass briquettes, or other approved clean cellulosic biomass, in tons, for each calendar month.

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (2) The permittee shall maintain daily records of the calculated actual heat input (average) from the co-firing of wood/grass briquettes, or other approved clean cellulosic biomass as a percentage of the total actual heat input to this emissions unit.

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (3) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60,



Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (the Portsmouth Local Air Agency) upon request.

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

[Authority for term: P0106805 and 3745-77-07(C)(1)]

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

The continuous opacity monitor is located in the exhaust stack after the FGD scrubber. The continuous opacity monitoring equipment monitors and records opacity during startup and shutdown operations during dry stack conditions when the flue gases are not passing through the desulfurization control equipment.

Because of the difficulties with monitoring opacity from a wet stack, Ohio EPA, DAPC, has drafted revised rules to address the scrubber/opacity issue. These rules have not yet gone out for public comment and are subject to change during the rule development and approval stages. However, the proposed approach for these rules is to replace the need for a continuous opacity monitor with a continuous particulate monitor (PM CEMS). Once the rules are promulgated and approved into Ohio's State Implementation Plan (SIP), DP&L can petition the Director to remove the COM's monitoring requirement.

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

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
- d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
- f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

[Authority for term: P0106805, 40 CFR Part 60 and 3745-77-07(C)(1)]



- (5) To obtain an exemption from the visible emissions limitations specified in OAC rule 3745-17-17(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor(s) and recorder(s) that measure and record the temperature of the boiler exhaust gases entering the ESP::
- a. during all periods of start-up until the ESPs are operational or until the inlet temperature of the ESPs achieve a temperature of two hundred fifty (250) degrees Fahrenheit; and
 - b. during all periods of shutdown until the inlet temperature of the ESPs drop below the temperature of two hundred fifty (250) degrees Fahrenheit. An electronic or hardcopy record of the temperature during periods of start-up and shutdown shall be maintained.

The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

[Authority for term: OAC rules 3745-17-07(A)(3)(a) and (b)]

- (6) To obtain an exemption from the visible emissions limitations specified in OAC rule 3745-17-07(A), the permittee shall operate and maintain a temperature monitor that measures the temperature of the boiler exhaust gases entering the ESP:
- a. during all periods of start-up until the baghouse is operational or until the inlet temperature of the ESPs achieves a temperature of five hundred (500) degrees Fahrenheit; and
 - b. during all periods of shutdown until the inlet temperature of the ESPs drop below the temperature of six hundred (600) degrees Fahrenheit. An electronic copy or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit

[Authority for term: OAC rule 3745-17-07(D), pending SIP approval]

- (7) Until such time that an alternative monitoring option becomes available and is accepted by Ohio EPA and USEPA, the permittee shall operate and maintain equipment to continuously monitor and record the particulate mass emissions data in units of the standard(s) from this emission unit during operations in which the flue gas is passing through the desulfurization control equipment. Continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR 60.13, 40 CFR Part 60, Appendix B, Performance Specifications 11 and modifications as approved by Ohio EPA and USEPA, and be operated in accordance with 40 CFR Part 60, Appendix B,



Performance Specifications 11 and modifications as approved by USEPA, and 40 CFR Part 60, Appendix F, Procedure 2.

The continuous monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous particulate monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 11, with any modifications as approved by Ohio EPA and USEPA. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous particulate monitoring system: particulate emissions in units of the standard(s) on a one-hour basis, results of daily zero/span calibration checks, magnitude of manual calibration adjustments, the duration of time that the continuous particulate monitoring system was not operating while flue gases were passing through the desulfurization control device, and the duration of time that the flue gases were passing through the desulfurization control device.

[Authority for term: P0106805, 40 CFR Part 60.13, 40 CFR Part 64, and 3745-77-07(C)(1)]

- (8) The permittee shall perform periodic Method 9 readings. The Method 9 readings must be taken by a certified observer with the following conditions:
- a. Monthly Method 9 readings must be taken for at least two hours each consecutive month but may be performed in no less than 30- minute intervals during regular source operation.
 - b. If excess opacity is identified during monthly Method 9 readings, the permittee must revert back to weekly Method 9 readings until six consecutive weeks of Method 9 data indicate compliance with the opacity limit.
 - c. If continuous compliance with the opacity limitation is demonstrated for 6 consecutive months, the permittee may petition the Director and USEPA for a reduction in the frequency of Method 9 readings.

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (9) Each continuous particulate monitoring system installed shall meet the siting requirements in 40 CFR Part 60, Appendix B, Performance Specifications 11.

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

[Authority for term: P0106805, 40 CFR Part 60, 40 CFR Part 64, and 3745-77-07(C)(1)]



- (10) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous SO₂ monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the Portsmouth Local Air Agency) upon request.

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

[Authority for term: P0106805, 40 CFR Part 60, 40 CFR Part 75, and 3745-77-07(C)(1)]

- (11) The permittee shall operate and maintain equipment to continuously monitor and record SO₂ emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of data obtained by the continuous SO₂ monitoring system including, but not limited to:

- a. emissions of SO₂ in parts per million on an instantaneous (one-minute) basis;
- b. emissions of SO₂ in all units of the applicable standard(s) on an hourly average basis;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous SO₂ monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous SO₂ monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous SO₂ monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

[Authority for term: P0106805, 40 CFR Part 60, 40 CFR Part 75, and 3745-77-07(C)(1)]



- (12) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NO_x monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the Portsmouth Local Air Agency) upon request.

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

[Authority for term: P0106805, 40 CFR Part 60, 40 CFR Part 75, and 3745-77-07(C)(1)]

- (13) The permittee shall operate and maintain equipment to continuously monitor and record NO_x emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

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

- a. emissions of NO_x in parts per million on an instantaneous (one-minute) basis;
- b. emissions of NO_x in all units of the applicable standard(s) on an hourly average basis;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous NO_x monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO_x monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO_x monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

[Authority for term: P0106805, 40 CFR Part 60, 40 CFR Part 75, and 3745-77-07(C)(1)]



- (14) Once the permittee commences modification in accordance with PTI P0106805, the permittee shall install, operate, and maintain equipment to continuously monitor and record CO emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60.

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

- a. emissions of CO in parts per million on an instantaneous (one-minute) basis;
- b. emissions of CO in pounds per hour and in all units of the applicable standard(s) on an hourly average basis;
- c. results of quarterly cylinder gas audits;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous CO monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous CO monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous CO monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

[Authority for term: P0106805, 40 CFR Part 60, and 3745-77-07(C)(1)]

- (15) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous CO₂ monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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



[Authority for term: P0106805, 40 CFR Part 60, 40 CFR Part 75, and 3745-77-07(C)(1)]

- (16) The permittee shall operate and maintain equipment to continuously monitor and record CO₂ emitted from this emissions unit in percent CO₂. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60 and Part 75.

The permittee shall maintain records of data obtained by the continuous CO₂ monitoring system including, but not limited to:

- a. percent CO₂ on an instantaneous (one-minute) basis;
- b. results of quarterly cylinder gas audits or linearity checks;
- c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- d. results of required relative accuracy test audit(s);
- e. hours of operation of the emissions unit, continuous CO₂ monitoring system;
- f. the date, time, and hours of operation of the emissions unit without the continuous CO₂ monitoring system;
- g. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous CO₂ monitoring system; as well as,
- h. the reason (if known) and the corrective actions taken (if any) for each such event in (f) and (g).

[Authority for term: P0106805, 40 CFR Part 60, 40 CFR Part 75, and 3745-77-07(C)(1)]

- (17) The permittee shall maintain daily records of the total heat input values as determined through F-Factor and carbon dioxide calculations as specified in 40 CFR Part 60, Appendix A, Method 19.

[Authority for term: P0106805, 40 CFR Part 60, and 3745-77-07(C)(1)]

- (18) The permittee shall have the liquid waste from the emissions unit cleaning process tested to determine if it is a hazardous waste. Only non-hazardous liquid waste from the cleaning process shall be evaporated in this emissions unit.

Any hazardous waste generated from the cleaning process shall be handled, stored, and disposed of in accordance with all State and federal requirements for hazardous waste.

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (19) The permit to install for this emissions unit B001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each



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pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: Manganese

TLV (ug/m3): 0.2

Maximum Hourly Emission Rate (lbs/hr): 0.60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.03

MAGLC (ug/m3): 4.8

Pollutant: Acetaldehyde

TLV (ug/m3): 33.2

Maximum Hourly Emission Rate (lbs/hr): 0.39

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.02

MAGLC (ug/m3): 790

Pollutant: Benzene

TLV (ug/m3): 1.6

Maximum Hourly Emission Rate (lbs/hr): 1.57

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.08

MAGLC (ug/m3): 38.1

Pollutant: Formaldehyde

TLV (ug/m3): 0.27

Maximum Hourly Emission Rate (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.12

MAGLC (ug/m3): 6.4



Pollutant: Toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 0.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.02

MAGLC (ug/m3): 4,476

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[Authority for term: P0106805, OAC rule 3745-114-01, and 3745-77-07(C)(1)]

- (20) If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);



- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Authority for term: P0106805, OAC rule 3745-114-01, and 3745-77-07(C)(1)]

- (21) The permittee shall maintain records of a representative manifest of the biomass fuel which provides a description of the biomass fuel including origin and description / composition of the material on a monthly basis or if there is an expected change in the biomass blend.

These records shall be made available to the Director (the Portsmouth Local Air Agency) upon request.

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (22) The permittee shall collect and record the temperature of the boiler exhaust gases entering the ESP (a) during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves a temperature of 500 degrees Fahrenheit and (b) during all periods of shutdown until the inlet temperature of the ESP drops below 600 degrees Fahrenheit.

[Authority for term: P0091215 and 3745-77-07(C)(1)]

- (23) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart UUUUU, including the following sections (As effective with the compliance date of April 16, 2015):

a) Applicable Rule	b) Requirement
c) 63.10032-63.10033	d) Recordkeeping requirements

[Authority for term: 40 CFR Part 63 and 3745-77-07(C)(1)]

- e) Reporting Requirements

- (1) **The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month renewable fuel usage rate limitation and, for the first 12 calendar months after commencing operation in accordance with PTI P0106805, all exceedances of the maximum allowable cumulative renewable fuel usage levels.**



[Authority for term: P0106805, 40 CFR Part 60, 40 CFR Part 75, and 3745-77-07(C)(1)]

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Portsmouth Local Air Agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous opacity monitor;
 - iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total operating time (hours) of the emissions unit;
 - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii. the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;
 - viii. the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
 - ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

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



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

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

[Authority for term: P0106805 and 3745-77-07(C)(1)]

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

a. The permittee shall submit reports within 30 days following the end of each calendar quarter via air services to the Portsmouth Local Air Agency documenting all instances of particulate values in excess of the limitations in b)(1)c of this permit when the emissions unit was operating and gases were passing through the desulfurization control device, detailing the date, commencement and completion times, duration, magnitude (pound per million BTU particulate), reason (if known), and corrective action(s) taken (if any) of each boiler operating day average above the applicable particulate limitation.

The reports shall also document any continuous particulate monitoring system downtime while the emissions unit was in operation and gases were passing through the desulfurization control device, (date, time, duration and reason), along with any corrective action(s) taken.

The report shall also include the date, time, reason, and corrective action(s) taken for each period of source or control equipment malfunction during periods when the emission unit was operating and the gases were passing through the desulfurization control device.

The total operating time that the emissions unit was operating and gases were passing through the desulfurization control device, and the total time of the analyzer shall also be included in this report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with date, time, reason and corrective action(s) taken for each time period of source or control equipment malfunction. The report shall also include the total operating time that the emissions unit was operating and gases were passing through the desulfurization control device, and the total operating time of the analyzer.

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. The total of any continuous opacity monitoring system downtime while the emissions unit was on line and flue gases were not passing through the desulfurization control device, and any continuous particulate monitoring system downtime while the emission unit was operating and flue gases were passing through the desulfurization control device.



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- ii. The total time (hrs) that the emissions unit was in operation: the total of the operating time that the emission unit was operating and flue gases were not passing through the desulfurization control device and the total operating time that the emissions unit was operating and flue gases were passing through the desulfurization control device.
- iii. The total excess emissions of particulate recorded for the quarter. Opacity excess emissions will be reported on a 6-minute block average basis while flue gases were not passing through the desulfurization control device. Particulate emissions will be reported when flue gases are passing through the desulfurization control device, and shall be reported on a boiler operating day average basis (arithmetic average of all operating one-hour periods). For limitations with other specified averaging periods, an average of the recorded hourly data in the specified units of the standard(s) shall be reported.

[Authority for term: P0106805, 40 CFR Part 64, and 3745-77-07(C)(1)]

- (4) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO₂ monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Portsmouth Local Air Agency, documenting all instances of SO₂ emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Part 75, OAC Chapter 3745-18, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s) on a rolling, 3-hour average basis.
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous SO₂ and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total SO₂ emissions for the calendar quarter (tons);



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- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous SO₂ monitoring system while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous SO₂ monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction** of the continuous SO₂ monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous SO₂ monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

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

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

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (5) The permittee shall collect, record, and maintain measurements, data, records, and reports for the continuous SO₂ monitoring system required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required per 40 CFR Part 75.

[Authority for term: P0106805, 40 CFR Part 75, and 3745-77-07(C)(1)]

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



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- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Portsmouth Local Air Agency, documenting all instances of NO_x emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Parts 75 and 76, and OAC Chapters 3745-14, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s) on a rolling, 3-hour average basis.
- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous NO_x and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total NO_x emissions for the calendar quarter (tons);
 - vi. the total operating time (hours) of the emissions unit;
 - vii. the total operating time of the continuous NO_x monitoring system while the emissions unit was in operation;
 - viii. results and dates of quarterly cylinder gas audits or linearity checks;
 - ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
 - x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO_x monitor out-of-control and the compliant results following any corrective actions;
 - xi. the date, time, and duration of any/each malfunction** of the continuous NO_x monitoring system, emissions unit, and/or control equipment;
 - xii. the date, time, and duration of any downtime** of the continuous NO_x monitoring system and/or control equipment while the emissions unit was in operation; and



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

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

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

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

[Authority for term: P0106805 and 3745-77-07(C)(1)]

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

[Authority for term: P0106805, 40 CFR Part 75, and 3745-77-07(C)(1)]

- (8) Once the permittee commences modification in accordance with PTI P010680, the permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Portsmouth Local Air Agency, documenting all instances of CO emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s) on a rolling, 24-hour average basis.
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous CO and other associated monitors;



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- iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
- iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
- v. the total CO emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous CO monitoring system while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction** of the continuous CO monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous CO monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

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

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

[Authority for term: PTI P0106805 and 3745-77-07(C)(1)]



- (9) Once the permittee commences modification in accordance with PTI P0106805, the permittee shall collect, record, and maintain measurements, data, records, and reports for the continuous CO monitoring system required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required per 40 CFR Part 75.

[Authority for term: P0106805, 40 CFR Part 75, and 3745-77-07(C)(1)]

- (10) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO₂ monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of continuous CO₂ monitoring system downtime and malfunction while the emissions unit was on line.
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous CO₂ and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the total operating time (hours) of the emissions unit;
 - v. the total operating time of the continuous CO₂ monitoring system while the emissions unit was in operation;
 - vi. results and dates of quarterly cylinder gas audits or linearity checks;
 - vii. unless previously submitted, results and dates of the relative accuracy test audit(s) (during appropriate quarter(s));
 - viii. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO₂ monitor out-of-control and the compliant results following any corrective actions;
 - ix. the date, time, and duration of any/each malfunction* of the continuous CO₂ monitoring system while the emissions unit was in operation;



- x. the date, time, and duration of any downtime* of the continuous CO₂ monitoring system while the emissions unit was in operation; and
- xi. the reason (if known) and the corrective actions taken (if any) for each event in (b)(ix) and (x).

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

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

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (11) The permittee shall collect, record, and maintain measurements, data, records, and reports for the continuous CO₂ monitoring system required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required per 40 CFR Part 75.

[Authority for term: P0106805, 40 CFR Part 75, and 3745-77-07(C)(1)]

- (12) The permittee shall submit analytical results of the tests conducted on the liquid waste, pursuant to d)(17) above, to the Portsmouth Local Air Agency 5 days prior to the evaporation of the liquid waste in this emissions unit.

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (13) 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.

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (14) **The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.**

[Authority for term: P0106805 and OAC rule 3745-114-01]

- (15) The permittee shall submit semiannual reports and such other notifications and reports to the Portsmouth Local Air Agency as are required pursuant to 40 CFR Part 63, Subpart UUUUU, per the following sections:



Applicable Rule	Requirement
63.10030-63.10031	Submitting notifications and reports

[Authority for term: 40 CFR Part 63 and 3745-77-07(C)(1)]

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:

PM emissions from the boiler stack shall not exceed 0.10 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 5 or 17 and the procedures in 40 CFR Part 60.46 and OAC rule 3745-17-03(B)(9).

Ongoing compliance with the PM limitation contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

b. Emission Limitation:

The controlled PM from the chemical cleaning and evaporation process shall not exceed 0.73 lb/hr and 0.03 ton/year.

Applicable Compliance Method:

These emission limitations were established by dividing the estimated maximum amount of iron and copper removed from the boiler (15,270 lbs) by the time period during which the cleaning solution is evaporated in the boiler (84 hrs at a rate of 50 gallons/minute) and multiplying the resulting lbs/hr emission rate by the control efficiency of the ESP (99.6%).

If required, the permittee shall demonstrate compliance with the hourly emission limitation by either (1) re-conducting the tests that yielded the values used to establish the hourly emission limitation above, or (2) performing the particulate emission tests required in f)(2) during the cleaning process.



c. Emission Limitation:

Any gases discharged into the atmosphere from this emissions unit shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

Ongoing compliance with the opacity limitation contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

In accordance with d)(7) above, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitation:

SO₂ emissions from the boiler stack shall not exceed 1.2 lbs/mmBtu of actual heat input.

Applicable Compliance Method:

Ongoing compliance with the SO₂ emission limitations contained in this permit, 40 CFR Parts 60 and 75, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

If required, the permittee shall demonstrate compliance with the allowable mass emission rate for SO₂ in accordance with the methods and procedures specified in 40 CFR Part 60.46.

e. Emission Limitation:

NO_x emissions from the boiler stack shall not exceed 0.70 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Ongoing compliance with the NO_x emission limitations contained in this permit, 40 CFR Parts 60 and 75, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.



If required, the permittee shall demonstrate compliance with the allowable mass emission rate for NO_x in accordance with the methods and procedures specified in 40 CFR Part 60.46.

f. Emission Limitation:

When co-firing coal with wood/ grass briquettes or other approved clean cellulosic biomass:

CO emissions from the boiler stack shall not exceed 0.15 lb/mmBtu of actual heat input (as a 24-hour average), 889.2 lbs/hr (as a 24-hour average) and 3,895 tpy.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation shall be demonstrated based upon the applicable emissions tests specified in f)(2) and compliance with the co-firing operational limitation in c)(2).

Ongoing compliance with the CO emission limitations contained in this permit, 40 CFR Parts 60 and 75, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

The annual emission rate is based upon the emissions unit's maximum rated heat input capacity of 5,928 mmBtu per hour at the allowable CO emissions rate of 0.15 pound per mmBtu for 8,760 hours per year. Compliance with the annual CO emission limitation shall be demonstrated by the CO emissions record keeping as specified in d)(13).

g. Emission Limitation:

VOC emissions from the boiler stack shall not exceed 0.0034 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation shall be demonstrated through the VOC emission testing required in f)(2) and compliance with the co-firing operational limitation in c)(2).

The emission limitation specified above is based on AP-42 emission factors found in Sections 1.1-19 and 1.6-3 and the co-firing fuel proportion of 95% coal and 5% wood/grass briquettes, or other approved clean cellulosic biomass.



h. Emission Limitation:

Emissions from the boiler stack shall not exceed:

0.03 lb/MMBtu (PM) or 0.30 lb/MWh (PM); OR
5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh of Total non-Hg HAP metals; OR

Individual HAP metals:

Antimony (Sb) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh.
Arsenic (As) 1.1E0 lb/TBtu or 2.0 E-2 lb/GWh.
Beryllium (Be) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh.
Cadmium (Cd) 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh.
Chromium (Cr) 2.8E0 lb/TBtu or 3.0E-2 lb/GWh.
Cobalt (Co) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh.
Lead (Pb) 1.2E0 lb/TBtu or 2.0E-2 lb/GWh.
Manganese (Mn) 4.0E0 lb/TBtu or 5.0E-2 lb/GWh.
Nickel (Ni) 3.5E0 lb/TBtu or 4.0E-2 lb/GWh.
Selenium (Se) 5.0E lb/TBtu or 6.0E-2 lb/GWh.
Hydrogen chloride (HCl) 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh, OR

Sulfur dioxide (SO₂) 2.0E-1 lb/MMBtu or 1.5E0 lb/MWh.

Mercury (HG) 1.2E0 lb/TBtu or 1.3E-2 lb/MWh.

Applicable Compliance Method:

Compliance with the applicable limit(s) shall be demonstrated through f)(5) below.

[Authority for term: P0106805, 40 CFR Part 63, and 3745-77-07(C)(1)]

(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 while burning coal shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration; and co-firing with wood/grass briquettes, or other approved clean cellulosic biomass as identified in permit to install P0106805.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PM while burning coal, and for PM, CO, and VOC when co-firing coal with wood/grass briquettes, or other approved clean cellulosic biomass as specified in b)(1)c, b)(1)h and b)(1)i.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) and emission factors:



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- i. for PM: 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 5 or 17, and the procedures specified in OAC rule 3745-17-03(B)(9);
- ii. for VOC: 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 25 or 25A; and
- iii. for CO: 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

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 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.

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (3) Within 60 days of the permittee commencing modification in accordance with PTI P0106805, the permittee shall conduct certification tests of the continuous CO monitoring system in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate) and 6; and ORC section 3704.03(l).

Personnel from the Ohio EPA Central Office and the Portsmouth Local Air Agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the Portsmouth Local Air Agency and one



copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

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

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (4) Ongoing compliance with the CO monitoring requirements contained in this permit, 40 CFR Parts 60 and 75, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

[Authority for term: P0106805 and 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart UUUUU, including the following sections:

Table with 2 columns: Applicable Rule, Requirement. Rows include 63.10000 (General requirements), 63.10005 (Initial compliance requirements), 63.10006 (Subsequent performance test or tune-ups), 63.10007 (Methods and procedures for performance tests), 63.10009 (Emissions averaging), 63.10011 (Compliance with the emissions limits and work practice standards), and 63.10020-63.10023 (Continuous compliance requirements).

[Authority for term: 40 CFR Part 63 and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group -Auxiliary Boilers: B002 (Auxiliary boiler A) ,B003 (Auxiliary boiler B),

EU ID	Operations, Property and/or Equipment Description
B002	Babcock and Wilcox distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) auxiliary boiler, having a nominal capacity of 95.7 mmBtu/hr. Auxiliary Boiler A has the capacity to burn B20 (biodiesel based liquid fuel) or less as an alternate to distillate No. 2 fuel oil in all stationary combustion equipment.
B003	Babcock and Wilcox distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) auxiliary boiler, having a nominal capacity of 95.7 mmBtu/hr. Auxiliary Boiler B has the capacity to burn B20 (biodiesel based liquid fuel) or less as an alternate to distillate No. 2 fuel oil in all stationary combustion equipment.

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 (PTI P0107275 issued 2/22/2012)	While burning biodiesel fuel B20: Nitrogen oxides (NO _x) emissions shall not exceed 0.23 lb/mmBtu actual heat input and 7.77 tons per year. See b)(2)a. Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-10(B), and 3745-18-06(D).
b.	OAC paragraph 3745-31-05(A)(3), as effective 12/01/06 (PTI P0107275 issued 2/22/2012)	See b)(2)b.
c.	OAC paragraph 3745-31-05(E) (PTI P0107275 issued 2/22/2012)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
f.	OAC rule 3745-18-06(D)	Sulfur dioxide (SO ₂) emissions shall not exceed 1.6 lbs/mmBtu actual heat input.
g.	40 CFR Part 63, Subpart DDDDD effective date of January 31, 2016 the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters. (applicability 40 CFR 63.7485;; affected source, 40 CFR 63.7490	The emissions from the boiler(s) shall not exceed the following emission standards or the emissions limitations specified in Table 2 for existing units for the subcategory for units designed to burn liquid fuel as identified in the most recent amendment to 40 CFR Part 63, Subpart DDDDD: 1.1E-03 lb of hydrogen chloride (HCl) / MMBtu of heat input; and 2.0E-06 lb of mercury (Hg) / MMBtu of heat input
h.	40 CFR 63.7521(a) and (b)	A site-specific fuel monitoring plan must be developed and submitted for each liquid fuel to be burned in the boiler, to include the information identified in this paragraph.
i.	40 CFR 63.7500(a)(1) and (2); and 40 CFR 63.7495	Each boiler must meet the applicable emission limits identified in Table 2; the work practice standard in Table 3; and the operating limits in Table 4 to the subpart by the compliance date identified in 40 CFR 63.7495.
j.	40 CFR 63.7510(e); 40 CFR 63.7495(b); and 40 CFR 63.7(a)(2)	An existing boiler shall demonstrate initial compliance with the emission limits in Table 2 to the NESHAP no later than 180 days after the compliance date identified in 40 CFR 63.7495(b).
k.	40 CFR 63.7510(e); 40 CFR 63.7530(e); 40 CFR 63.7500(c); and 40 CFR Part 63, Subpart DDDDD Table 3	For each existing boiler, an initial tune-up and a one-time energy assessment must be performed by a qualified energy assessor no later than the compliance date identified in 40 CFR 63.7495. Limited-use boilers must be included in the energy assessment. The required information for the energy assessment



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and the frequency of tune-ups is identified in Table 3.
i.	40 CFR 63.7505(a) and (c); and 40 CFR Part 63, Subpart DDDDD Table 3 #5	Compliance with the emissions standards and operating limits of the NESHAP apply at all times, except during periods of startup and shutdown during which the requirements of Table 3 #5 apply. Compliance with the emissions limits is demonstrated through: performance testing; fuel analyses; and/or monitoring documented by CMS (CEMS, COMS, and CPMS)*.
m.	40 CFR 63.7505(c); and 40 CFR Part 63, Subpart DDDDD Table 6 #4	Following the initial compliance demonstration, compliance with the emission standards for HCl, Hg may be demonstrated using fuel analysis (instead of a performance test) if the emission rate, calculated according to 40 CFR 63.7530(c), is less than the applicable limit identified in Table 1 or 2. If opting to comply with the standard for TSM, compliance is demonstrated through conducting fuel analysis using the procedures and methods identified in Table 6 #4.
n.	40 CFR 63.7540(a)(1); and 40 CFR Part 63, Subpart DDDDD Tables 4 and 8	Continuous compliance with each emission limit, operating limit, and work practice standards in Tables 1 through 3 of the subpart must be demonstrated in accordance with the methods specified in Table 8 to the subpart. Operating above the established maximum or below the established minimum operating limit shall constitute a deviation of the operating limits identified in Table 4 of the subpart.
o.	40 CFR Part 63, Subpart DDDDD Table 10	The applicability of the General Provision in Part 63 Subpart A to boilers subject to Subpart DDDDD are identified in Table 10 to the subpart.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) or OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265



changes), such that BAT is no longer required by State regulations for NAAQS pollutant 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 3745-31-05, then these emission limits/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 NOx limit of 7.77 tpy is less than 10 tpy.

- c. Permit to Install P0107275 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 state modeling:

- i. restricting the annual amount of biodiesel fuel (B20) burned in this emissions unit to 500,000 gallons per year.

c) Operational Restrictions

- (1) The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide limitation specified in b)(1)f above.

[Authority for term: PTI P0107275 and OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall burn only distillate oil (number 1 and number 2 fuel oil, kerosene and diesel fuel, or a blend of number 2 fuel oil and biodiesel fuel (B20), but excluding number 4 fuel oil) in this emissions unit.

[Authority for term: PTI P0107275 and OAC rule 3745-77-07(A)(1)]

- (3) The maximum annual biodiesel fuel (B20) burned in this emissions unit shall not exceed 500,000 gallons based upon a rolling, 12-month summation of the renewable fuel use.

To ensure enforceability during the first 12 calendar months after commencing operation in accordance with PTI P0107275, the permittee shall not exceed the operating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Biodiesel Fuel (B20) Use (gallons)</u>
1	150,000 gallons
1-2	150,000 gallons
1-3	150,000 gallons
1-4	300,000 gallons
1-5	300,000 gallons



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1-6	300,000 gallons
1-7	425,000 gallons
1-8	425,000 gallons
1-9	425,000 gallons
1-10	500,000 gallons
1-11	500,000 gallons
1-12	500,000 gallons

After the first 12 calendar months of commencing operation in accordance with PTI P0107275, compliance with the annual renewable fuel usage limitation shall be based upon a rolling, 12- month summation of the renewable fuel usage in gallons.

[Authority for term: P0107275 and OAC rule 3745-77-07(A)(1)]

- (4) The biodiesel content of the fuel burned in this emission unit shall not exceed 20% by volume.

[Authority for term: P0107275 and OAC rule 3745-77-07(A)(1)]

- (5) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections (As effective with the compliance date of January 31, 2016):

1.	40 CFR 63.7515(d); 40 CFR 63.7540(a)(10); and 40 CFR Part 63, Subpart DDDDD Table 3 #3	Each boiler greater than or equal to 10 MMBtu/hour is required to have an annual tune-up (no more than 13 months after the previous tune-up) and inspection conducted in accordance with 40 CFR 63.7540(a)(10), which includes measuring the concentration of CO in the effluent gas stream in ppmv and oxygen in volume %, and maintaining a record/report of the results of the inspection and the fuel(s) burned in the boiler during the year.
2.	40 CFR 63.7530(h); and 40 CRFR Part 63, Subpart DDDDD Table 3 #5	A boiler subject to emission limits in Tables 2to Subpart DDDDD, must meet the work practice standard according to Table 3 of this subpart and during startup and shutdown must only follow the work practice standards according to item 5 of Table 3.
3	40 CFR 63.7505(c); 40 CFR 63.7510(b); 40 CFR 63.7530(c); and 40 CFR Part 63, Subpart DDDDD Tables 4 #7 and 8 #8	Where demonstrating compliance with the HCl, Hg, or TSM emissions standard(s) through fuel analyses, must maintain the fuel type or fuel mixture such that the HCl, Hg, and/or TSM emission rate(s), calculated according to 40 CFR 63.7530(c), less than the applicable limit(s) in Table 1 or 2 of the subpart.



[Authority for term: 40 CFR Part 63 and 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

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

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (3) For each day during which the permittee burns a prohibited fuel (i.e., one other than distillate oil as defined in c)(2) above), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall maintain monthly records of the following information:
 - a. the biodiesel fuel (B20) use for each month; and
 - b. beginning after the first 12 calendar months of commencing operation in accordance with PTI P0107275, the rolling, 12-month summation of the biodiesel fuel (B20) use, in gallons.

Also, during the first 12 calendar months after commencing operation in accordance with PTI P0107275, the permittee shall record the cumulative usage of biodiesel fuel (B20), in gallons, for each calendar month.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (5) If for each shipment of biodiesel fuel received the concentration of the fuel exceeds the (B20) limit as received because the permittee wants to blend the fuel on site, then the permittee has committed to keeping a spreadsheet on site identifying the information of the biodiesel use in d)(4) above and to sample the biodiesel fuel (B20) storage tank on at least a semi-annual basis.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]



- (6) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections (As effective with the compliance date of January 31, 2016):

1.	40 CFR 63.7555;and 40 CFR 63.10(b)	The records required by the NESHAP are identified in 40 CFR 63.7555 and they must be kept for at least 5 years following the date of the record or report submitted.
2.	40 CFR 63.7530(h); and 40 CRFR Part 63, Subpart DDDDD Table 3 #5	A boiler subject to emission limits in Tables 2to Subpart DDDDD, must meet the work practice standard according to Table 3 of this subpart and during startup and shutdown must only follow the work practice standards according to item 5 of Table 3.
3	40 CFR 63.7505(c); 40 CFR 63.7510(b); 40 CFR 63.7530(c); and 40 CFR Part 63, Subpart DDDDD Tables 4 #7 and 8 #8	Where demonstrating compliance with the HCl, Hg, or TSM emissions standard(s) through fuel analyses, must maintain the fuel type or fuel mixture such that the HCl, Hg, and/or TSM emission rate(s), calculated according to 40 CFR 63.7530(c), less than the applicable limit(s) in Table 1 or 2 of the subpart.
4	40 CFR 63.7540(a)(2)	Records must be kept of the type and amount of all fuels burned in each boiler during each reporting period, in order to demonstrate that all fuel burned in each unit would either: result in lower emissions of HCl, Hg, or TSM than the applicable emission limit (if demonstrating compliance through fuel analyses) or result in a lower fuel input of Cl, Hg, or TSM than the maximum values calculated during the last performance test (if demonstrating compliance through performance testing).
5	40 CFR 63.7530(c)	Emission rates, through fuel analysis, for HCl, Hg, and TSM must be calculated in accordance with 40 CFR 63.7530(c) using Equations 10 (for 90 th percentile confidence level pollutant concentration), 11 (for HCl), 12 (for Hg) and 13 for (TSM).
6.	40 CFR 63.7540(a)(3) and(a)(5)	If burning a new fuel and compliance with an HCl or Hg emission limit was demonstrated through fuel analyses, the emission rate must be recalculated using Equations 11 and/or 12 of 40 CFR 63.7530 and the recalculated HCl or Hg



		emission rate must be less than the applicable emission limits.
7.	40 CFR 63.7541	Following the compliance date for existing sources, the owner/operator demonstrating compliance under the emissions averaging provisions, must demonstrate compliance on a continuous basis by meeting the requirements in this section.

[Authority for term: 40 CFR Part 63 and 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Portsmouth Local Air Agency) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from d)(1) above. The notification shall include a copy of such record and shall be sent to the Director (the Portsmouth Local Air Agency) within 45 days after the deviation occurs.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a prohibited fuel (i.e., one other than distillate oil) was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (3) **The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month renewable fuel usage rate limitation and, for the first 12 calendar months after commencing operation in accordance with PTI P0107275, all exceedances of the maximum allowable cumulative renewable fuel usage levels.**

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (4) **The permittee shall submit deviation (excursion) reports that identify all exceedances of the biodiesel concentrations identified in d)(5) above, should the results from the biodiesel fuel storage tank exceed (B20) or greater than 20% biodiesel from the semi-annual testing.**

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections (As effective with the compliance date of January 31, 2016):



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1.	40 CFR 63.7495(d); 40 CFR 63.7545; and 40 CFR 63.7530(f)	The notification requirements identified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (6), 40 CFR 63.9(b) through (h), and 40 CFR 63.7545 shall be submitted to the appropriate district office or local air agency no later than the date identified in 40 CFR 63.7545.
2.	40 CFR 63.7550(a) and (b); and 40 CFR Part 63, Subpart DDDDD Table 9	The owner/operator must submit each compliance report identified in Table 9 to the NESHAP that is applicable to the boiler, either semiannually, annually, or biennially according to the requirements identified in 40 CFR 63.7550(b).
3.	40 CFR 63.7550(c) through (h)	These paragraphs identify the information required to be submitted in the compliance reports.
4.	CFR 63.7545(e); CFR 63.7515(g)**; CFR 63.7530(f); and OAC rule 3745-15-04(A)	A comprehensive written report on the results of performance tests and initial fuel analyses shall be submitted within 60 days after the completion of the test in the Notification of Compliance Status Report. Each report shall verify the unit has not changed or shall provide documentation of the revised parameters established during the performance test. However, Ohio rules require the testing results (signed by the person responsible for the tests) to be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).
5.	40 CFR 63.7521(b)	The site-specific fuel analysis plan must be submitted no later than 60 days before the date of the intended initial compliance demonstration and it shall include the information identified in this paragraph.
6.	40 CFR 63.7522(g)	If demonstrating compliance for existing units through emissions averaging, an implementation plan must be submitted in accordance with this paragraph no later than 180 days before demonstrating compliance using the emission averaging option.
7.	40 CFR 63.7530(e)	The Notification of Compliance Status report must include a signed certification that an energy assessment was completed according to Table 3 to the subpart and that it is an accurate depiction of the facility.



8.	40 CFR 63.7530(h)	If a boiler is subject to emission limits in Tables 1 or 2 to the subpart, must submit a signed statement in the Notification of Compliance Status report certifying that good combustion practices were employed during startup and shutdown periods and oxygen concentrations were maintained as specified by the manufacturer.
9.	40 CFR 63.7533(d)	If establishing emissions credits for implementing energy conservation measures, the owner/operator must submit an Implementation Plan (to the appropriate district office or local air agency) for the energy conservation measures to be implemented and it must contain the information contained in this paragraph.
10.	40 CFR 63.7540(b)	Each instance in which a boiler does not meet each/any applicable emission limit and/or operating limit in Tables 1 through 4 to the subpart, the owner/operator must report each as a deviation from the requirements of the Part 63 Subpart DDDDD, in accordance with 40 CFR 63.7550.

[Authority for term: 40 CFR Part 63 and 3745-77-07)C)(1)]

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 shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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



b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulates may be determined by dividing an emission factor of particulate per 1000 gallons of oil combusted by the heat content of the oil (in mmBtu/1000 gallons) as determined through the fuel analysis required in d)(2) above. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (09/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emission Limitation:

SO₂ emissions shall not exceed 1.6 lbs/mmBtu actual heat input.

Applicable Compliance Method:

Compliance with the allowable SO₂ emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

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

d. Emission Limitation:

While burning biodiesel fuel B20:

NO_x emissions shall not exceed 0.23 lb/MMBtu actual heat input and 7.77 tons per year.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable mass emission rate for NO_x in accordance with the methods and procedures specified in f)(2) below.

The annual emission rate is based upon the allowable NO_x emissions rate of 0.23 pound per mmBtu, from the March 2010 test, times the total annual heat input based upon the restriction of 500,000 gallons per year and nominal heat content of 135,200 Btu/gal, divided by 2000 lbs/ton. Compliance with the annual NO_x emission limitation shall be demonstrated by the B20 record keeping as specified in d)(4).



[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

1.1E-03 lb of hydrogen chloride (HCl) / MMBtu of heat input; and

2.0E-06 lb of mercury (Hg) / MMBtu of heat input

Applicable Compliance Method:

Compliance with the allowable hydrogen chloride and mercury emission limitation shall be demonstrated by through the fuel analysis requirements in section 2.d)(6) and 2.f)(3).

(2) Emission Testing Requirements

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

- a. The emission testing shall be conducted within 6 months after commencing operation in accordance with PTI P0107275.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PM and NO_x when firing with biodiesel fuel (B20) as specified in b)(1)a and b)(1)e.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) and emissions factors:
 - i. for PM, 40 CFR Part 60, Appendix A, Methods 1 through 4 and Methods 5 or 17 and the procedures specified in OAC rule 3745-17-03(B)(9); and
 - ii. for NO_x, 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7.

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 and combusting biodiesel (B20) fuel, 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).



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- 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.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections (As effective with the compliance date of January 31, 2016):

a.	40 CFR Part 63, Subpart DDDDD Tables 2	Table 2 to the NESHAP contains the emission limits for existing boilers and the sampling volume or test run duration required for performance testing
b.	40 CFR 63.7510(a); and 40 CFR 63.7530(a) and (b)	Initial compliance with 40 CFR Part 63, Subpart DDDDD shall be demonstrated through by conducting a fuel analysis for each type of fuel burned according to 40 CFR 63.7521 and Table 6.
c.	40 CFR 63.7510(a); and 40 CFR 63.7530(a) and (b)	Initial compliance with 40 CFR Part 63, Subpart DDDDD shall be demonstrated through performance testing according to 40 CFR 63.7520 and Table 5; by conducting a fuel analysis for each type of fuel burned according to 40 CFR 63.7521 and Table 6; by establishing operating limits (Table 4) according to 40 CFR 63.7530 and Table 7; and/or by conducting CMS performance evaluations according to 40 CFR 63.7525 in conjunction with the stack test.
d.	40 CFR 63.7530(b) and (c)	Where using fuel analyses to demonstrate compliance with HCl, Hg, or TSM limits, the maximum fuel pollutant input levels entering the boiler shall be established using the fuel type(s) or mixture(s) that has/have the highest content of each, Cl, Hg, and/or TSM. The maximum Cl, Hg, and/or TSM input (in lbs/MMBtu) shall be calculated as required in 40 CFR 63.7530(b) and the



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		90 th percentile confidence level pollutant concentration (in lbs/MMBtu) must be calculated as required in 40 CFR 63.7530(c).
e.	40 CFR 63.7510(b)	Compliance with the Table 2 emission limits for HCl, Hg, and TSM may be demonstrated through fuel analyses according to 40 CFR 63.7521 and Table 6 and by establishing operating limits according to 40 CFR 63.7530 and Table 8 to the NESHAP.
f.	40 CFR 63.7515(b)	Existing boilers demonstrating compliance for any pollutant using emission averaging must conduct performance tests annually for the boilers in the averaging group.
g.	40 CFR 63.7515(f)	If fuel analysis is used to demonstrate compliance with the Hg, HCl, or TSM limits, a fuel analysis must be conducted monthly according to 40 CFR 63.7521 for each type of fuel burned that is subject to a limit in Table 1 or 2. A fuel analysis must be conducted for any new fuel before it is burned (if subject to a limit in the NESHAP).
h.	40 CFR 63.7521(a) through (e); and 40 CFR 63.7530(c)	Fuel analyses must be conducted to determine the concentration of chloride and Hg in each solid and liquid fuel and the concentration of Hg in each "gas 2 (other)"* fuel (excluding fuels used only for startup/shutdowns or transient flame stability) according to paragraphs 40 CFR 63.7521(a) through (e), Table 6 to the NESHAP, and the site-specific fuel monitoring plan. A fuel analysis from the supplier may be used to meet this requirement if they use the Methods identified in Table 6. The concentration of chlorine, Hg, and/or TSM must be in units of lbs/MMBtu of each composite sample, for each fuel type, and according to the procedures in Table 6 to the NESHAP.
i.	40 CFR 63.7522(a) through (g)	Where there are more than one existing boiler in the same subcategory (40 CFR 63.7499), as an alternative to meeting the emission limits identified in Table 2 to the NESHAP for PM, HCl, and/or Hg for each boiler individually, compliance may



		be demonstrated through emissions averaging for the existing units in the same subcategory. The average emissions cannot be more than 90% of the applicable limit calculated according to the requirements in 40 CFR 63.7522. New units cannot be included in this compliance option.
j.	40 CFR 63.7522(h), (i), and (k)	Where a group of 2 or more existing boilers in the same subcategory vent through the same control device and to a single stack that does not receive emissions from units in other subcategories, the units may be treated as a single existing unit to demonstrate compliance with the PM, HCl, and/or Hg emission limit(s) in Table 2 to the subpart; or may be treated as a separate stack for purposes of emissions averaging.

[Authority for term: 40 CFR Part 63 and 3745-77-07(C)(1)]

(4) Where the permittee is requesting to demonstrate compliance with Hg, HCl, or TSM through fuel analyses, as allowed per 40 CFR 63.7505(c), and has submitted certified laboratory fuel analyses testing results demonstrating that sufficient data has been collected to comply with 40 CFR 63.7530(c), for a 90th percentile confidence level of the subject pollutant concentration, the permittee shall also calculate and maintain a record of the subject pollutant's emission rate as required per 40 CFR 63.7530(c). For each pollutant that the permittee elects to demonstrate compliance through fuel analyses, the fuel analysis shall be conducted according to 40 CFR 63.7521 and Table 6 to the Subpart. The following procedures and calculations shall be documented and submitted to the Ohio EPA, Division of Air Pollution Control, Central Office in order to be considered for the exemption from performance stack testing:

- a. if burning more than one fuel type, the permittee shall determine the fuel or fuel mixture that would result in the maximum emission rates of each/the pollutant (which could mean multiple fuels);
- b. the 90th percentile confidence level, of the pollutant concentration of the composite samples of each fuel type analyzed, shall be determined using the one-sided z-statistic test described in Equation 10 from 40 CFR 63.7530(c)(2) as follows:

$$P_{90} = \text{mean} + (\text{SD} \times t)$$



Where:

P₉₀ = 90th percentile confidence level pollutant concentration, in pounds per million Btu

mean = arithmetic average of the pollutant concentration in the fuel samples analyzed according to 40 CFR 63.7521, in pounds per million Btu

SD = standard deviation of the pollutant concentration in the fuel samples analyzed according to 40 CFR 63.7521, in pounds per million Btu

t = t distribution critical value for 90th percentile (0.1) probability for the appropriate degrees of freedom (number of samples minus one), as obtained from a Distribution Critical Value Table

- c. in order to demonstrate compliance with the applicable emission limit for HCl, the HCl emission rate for the boiler shall be calculated to be less than the applicable emission limit using Equation 11 from 40 CFR 63.7530(c)(3) as follows:

$$HCl = \sum_{i=1}^n [(C_{i90})(Q_i)(1.028)]$$

Where:

HCl = HCl emission rate from the boiler in pounds per million Btu.

C_{i90} = 90th percentile confidence level concentration of chlorine in fuel type "i" in pounds per million Btu, as calculated according to Equation 10 above

Q_i = fraction of total heat input from fuel type "i" based on the fuel mixture that has the highest content of chlorine. If only one fuel type is used, it is not necessary to determine the value of Q_i and it will equal "1".

n = number of different fuel types burned in the boiler for the mixture having the highest content of chlorine.

1.028 = molecular weight ratio of HCl to chlorine

- d. in order to demonstrate compliance with the applicable emission limit for Hg, the Hg emission rate for the boiler shall be calculated to be less than the applicable emission limit using Equation 12 from 40 CFR 63.7530(c)(4) as follows:

$$Hg = \sum_{i=1}^n [(Hg_{i90})(Q_i)]$$

Where:

Hg = Hg emission rate from the boiler in pounds per million Btu.



Hg₉₀ = 90th percentile confidence level concentration of Hg in fuel type "i" in pounds per million Btu, as calculated according to Equation 10 above.

Q_i = fraction of total heat input from fuel type "i", based on the fuel mixture that has the highest Hg content. If only one fuel type is used, it is not necessary to determine the value of Q_i and it will equal "1".

n = number of different fuel types burned in the boiler for the mixture having the highest content of Hg.

- e. in order to demonstrate compliance with the applicable emission limit for TSM, the TSM emission rate for the boiler shall be calculated to be less than the applicable emission limit using Equation 13 from 40 CFR 63.7530(c)(5) as follows:

$$TSM = \sum_{i=1}^n [(TSM_{i90})(Q_i)]$$

Where:

TSM = TSM emission rate from the boiler in pounds per million Btu.

TSM_{i90} = 90th percentile confidence level concentration of TSM in fuel type "i" in pounds per million Btu, as calculated according to Equation 10 above.

Q_i = fraction of total heat input from fuel type "i", based on the fuel mixture that has the highest TSM content. If only one fuel type is used, it is not necessary to determine the value of Q_i and it will equal "1".

n = number of different fuel types burned in the boiler for the mixture having the highest content of TSM.

[40 CFR 63.7530(c)], [40 CFR 63.7505(c)], and [40 CFR 63.7510(b)]

g) Miscellaneous Requirements

- (1) None.



3. B004, Combustion Turbine Unit

Operations, Property and/or Equipment Description:

No.2 fuel oil-fired stationary combustion turbine (General Electric, Model PG5341P) with diesel fuel-fired starter; 299.4 MMBtu peak rated heat input, controlled with a water injection system and the capacity to burn B20 (biodiesel based liquid fuel) or less as an alternate to distillate No. 2 fuel oil. Unit was derated to less than 24.9 MW during operation in order to remove the black start status from the turbine in order to generate MW to serve the grid, and to add water injection system as control to meet the 40 CFR Part 60, Subpart GG limit.

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.	ORC 3704.03(T) Best Available Technology (BAT) (PTI P0107275 issued 2/22/2012)	Nitrogen oxides (NO _x) emissions shall not exceed 0.60 lb/mmBtu actual heat input. See b)(2)a. Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-11(B)(4), and 3745-18-06(F), and 40 CFR Part 60, Subpart GG.
b.	OAC paragraph 3745-31-05(E) (PTI P0107275 issued 2/22/2012)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)(4)	Particulate emissions shall not exceed 0.040 lb/mmBtu actual heat input.
e.	OAC rule 3745-18-06(F)	Sulfur dioxide (SO ₂) emissions shall not exceed 0.5 lb/mmBtu actual heat input.
f.	40 CFR Part 60, Subpart GG	The sulfur content of the distillate oil fired in this emissions unit shall not exceed 0.8%, by weight. NO _x emissions shall not exceed 75



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		ppmvd at 15% oxygen. See b)(2)b.
g.	OAC rule 3745-110-03(E)(2)(b) NOx - Reasonably Available Control Technology (RACT)	This emissions unit is exempt pursuant to paragraph (J) of rule 3745-110-03.
h.	40 CFR Part 63, Subpart YYYY [40 CFR 63.6080-63.6175] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines.	See b)(2)e.
i.	40 CFR Part 63 Subpart ZZZZ [40CFR63.6580 to 63.6675] In accordance with 40 CFR 63.6585, this emissions unit is a stationary internal combustion engine (ICE) subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.	The existing stationary compression ignition (CI) reciprocating internal combustion engine (RICE), located at a major source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than May 3, 2013.
j.	40 CFR 63.6600(d) Table 2c #5 to Subpart ZZZZ	Following the compliance date of 5/3/13, emissions of carbon monoxide (CO) shall not exceed 23 ppmvd at 15% O ₂ or emissions of CO shall be reduced be reduced by 70% or more.
k.	40 CFR 63.6604 40 CFR 80.510(b)	The sulfur content of the diesel fuel burned in this emissions unit shall not exceed 15 ppm or 0.0015% sulfur by weight. See b)(2)f.

(2) Additional Terms and Conditions

- a. Permit to Install P0107275 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 state modeling.
 - i. restricting the annual amount of biodiesel fuel (B20) burned in this emissions unit to 271,200 gallons per year;
 - ii. restricting the annual hours of operation for this emission unit to 500 hours;



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- iii. the installation of a water injection system to reduce NO_x emissions; and
 - iv. derating the unit to less than 24.9 MW during any operating hour.
- b. The emissions limits based on this applicable rule are less stringent than the limits established pursuant to ORC 3704.03 (T). Except as provided for in the terms and conditions in this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.
- c. If this emissions unit meets the requirements of 40 CFR 75.19(a)(1), (a)(2) and (b), the low mass emissions (LME) excepted methodology in 40 CFR 75.19(c) may be used in lieu of continuous emission monitoring systems or, if applicable, in lieu of methods under Appendices D, E, and G to 40 CFR Part 75, for the purpose of determining the unit heat input, NO_x, SO₂, and CO₂ mass emissions, and the NO_x emission rate under 40 CFR Part 75. If the permittee of a qualifying emissions unit elects to use the LME methodology, it must be used for all parameters that are required to be monitored by the applicable program(s).
- d. This emissions unit is being derated to less than 24.9 MW during any source operating hour to avoid the Acid Rain requirements of 40 CFR Part 75.
- e. This emissions unit is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines, 40 CFR Part 63, Subpart YYYYY.
- In accordance with 40 CFR Part 63.6090(4)... "Existing stationary combustion turbines in all subcategories do not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary for any existing stationary combustion turbine, even if a new or reconstructed turbine in the same category would require an initial notification."
- f. The quality of the diesel fuel burned in this emission unit shall meet the following specifications on an "as received" basis:
- i. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.0015 pound sulfur dioxide/MMBtu actual heat input; and 15 ppm sulfur or 0.0015% sulfur by weight
 - ii. a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent; and
 - iii. a heating value greater than 135,000 Btu/gallon.
- Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.
- c) Operational Restrictions
- (1) This emissions unit shall not exceed 500 hours of operation per year, as a rolling, 12-month summation.



[Authority for term: P0107275 and OAC rule 3745-77-07(A)(1)]

- (2) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide limitations in b)(1)e and b)(1)k. above.

[Authority for term: P0107275, OAC rule 3745-77-07(A)(1), 40 CFR 63.6604, and 40 CFR 80.510(b)]

- (3) The permittee shall burn only distillate oil (number 1 and number 2 fuel oil, kerosene and diesel fuel, or a blend of number 2 fuel oil and biodiesel fuel (B20), but excluding number 4 fuel oil) in this emissions unit.

[Authority for term: P0107275 and OAC rule 3745-77-07(A)(1)]

- (4) The maximum annual biodiesel fuel (B20) burned in this emissions unit shall not exceed 271,200 gallons based upon a rolling, 12-month summation of the renewable fuel use.

To ensure enforceability during the first 12 calendar months after commencing operation in accordance with PTI P0107275, the permittee shall not exceed the operating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Biodiesel Fuel (B20) Use (gallons)</u>
1	67,800 gallons
1-2	67,800 gallons
1-3	67,800 gallons
1-4	135,600 gallons
1-5	135,600 gallons
1-6	135,600 gallons
1-7	203,400 gallons
1-8	203,400 gallons
1-9	203,400 gallons
1-10	271,200 gallons
1-11	271,200 gallons
1-12	271,200 gallons

After the first 12 calendar months of commencing operation in accordance with PTI P0107275, compliance with the annual renewable fuel usage limitation shall be based upon a rolling, 12- month summation of the renewable fuel usage in gallons.

[Authority for term: P0107275 and OAC rule 3745-77-07(A)(1)]

- (5) Start-up shall be defined as the time necessary to bring a turbine on line from a no load condition to fully activated water injection and shall not exceed a maximum of 60 minutes. The water injection shall be fully activated as soon as the start-up process allows. Shutdown periods shall not exceed 60 minutes.

[Authority for term: P0107275 and OAC rule 3745-77-07(A)(1)]



- (6) This emissions unit shall not exceed 24.9 MW during any operating hour.

[Authority for term: P0107275 and OAC rule 3745-77-07(A)(1)]

- (7) The biodiesel content of the fuel burned in this emission unit shall not exceed 20% by volume.

[Authority for term: P0107275 and OAC rule 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the rolling, 12-month summation of hours of operation for this emission unit.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D2880, D129, D1552, D4057, D240), or equivalent methods as approved by the Director.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (4) For each day during which the permittee burns a prohibited fuel (i.e., one other than distillate oil as defined in c)(3) above), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall maintain monthly records of the following information:

- a. the biodiesel fuel (B20) use for each month; and
- b. the distillate fuel use for each month; and
- c. beginning after the first 12 calendar months of commencing operation in accordance with PTI P0107275, the rolling, 12-month summation of the biodiesel fuel (B20) use, in gallons.
- d. If for each shipment of biodiesel fuel received the concentration of the fuel exceeds the (B20) limit as received because the permittee wants to blend the fuel on site, then the permittee has committed to keeping a spreadsheet on site



identifying the information of the biodiesel use in d)(5)a above and to sample the biodiesel fuel (B20) storage tank on at least a semi-annual basis.

- e. Also, during the first 12 calendar months of commencing operation in accordance with PTI P0107275, the permittee shall record the cumulative usage of biodiesel fuel (B20), in gallons, for each calendar month.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (6) The information management system for this emissions unit shall be capable of monitoring and recording electric output (in MW), fuel flow (gallons) and hours of operation.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (7) For each low mass emissions unit for which fuel-and-unit-specific NO_x emission rates are determined in accordance with 40 CFR 75.19(c)(1)(iv) and which has add-on NO_x emission controls of any kind or uses dry lowNO_x technology, the permittee shall develop and keep on-site a quality assurance plan which explains the procedures used to document proper operation of the NO_x emission controls. The plan shall include the parameters monitored (e.g., water-to-fuel ratio) and the acceptable ranges for each parameter used to determine proper operation of the unit's NO_x controls.

[Authority for term: P0107275, 40 CFR Part 75.19, and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
63.6605	General compliance requirements
63.6625	Monitoring, installation, collection, operation, and maintenance requirements
63.6635	Monitoring and collecting data
63.6655	Record keeping requirements
63.6660	In what form & how long must I keep my records

[Authority for term: 40 CFR Part 63 and 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Portsmouth Local Air Agency) in writing of any record which shows a deviation of the operating hours restriction from c)(1) above. The notification shall include a copy of such record and shall be sent to the Director (the Portsmouth Local Air Agency) within 45 days after the deviation occurs.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the Portsmouth Local Air Agency) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from d)(2) above. The



notification shall include a copy of such record and shall be sent to the Director (the Portsmouth Local Air Agency) within 45 days after the deviation occurs.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a prohibited fuel (i.e., one other than distillate oil) was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month renewable fuel usage rate limitation and, for the first 12 calendar months after commencing operation in accordance with PTI P0107275, all exceedances of the maximum allowable cumulative renewable fuel usage levels.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit deviation (excursion) reports that identify all exceedances of the biodiesel concentrations identified in d)(5)d above, should the results from the biodiesel fuel storage tank exceed (B20) or greater than 20% biodiesel from the semi-annual testing.

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall submit deviation (excursion) reports that identify all exceedances of the 24.9 MW limitation during any given hour that the emissions unit is in operation as identified in c)(6).

[Authority for term: P0107275 and OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
63.6645	Submitting notifications
63.6650	Submitting reports

[Authority for term: 40 CFR Part 63 and 3745-77-07(C)(1)]

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 shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.



Applicable Compliance Method:

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

b. Emission Limitation:

Particulate emissions shall not exceed 0.040 lb/mmBtu actual heat input.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

SO₂ emissions shall not exceed 0.5 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance with the allowable SO₂ emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

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

d. Emission Limitation

Sulfur Content Limitations for Diesel Fuel:

Sulfur content 15 ppm or $\leq 0.0015\%$ by weight sulfur

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements for the sulfur content of each shipment of diesel oil received. If meeting the standards in 40 CFR 80.510(b), this calculates to approximately 0.0015 lb SO₂/MMBtu.

e. Emission Limitation:

NO_x emissions shall not exceed 0.60 lb/mmBtu actual heat input.



Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable mass emission rate for NO_x in accordance with the methods and procedures specified in f)(2) below.

f. Emission Limitation:

NO_x emissions shall not exceed 75ppmvd at 15% oxygen.

The permittee shall demonstrate compliance with the allowable mass emission rate for NO_x in accordance with the methods and procedures specified in f)(2) below and the equations from 40 CFR Part 60.332.

Applicable Compliance Method:

$$STD=0.0075(14.4)/Y + F$$

where:

STD= allowable ISO corrected (if required as given in 60.335(b)1)) NO_x emissions concentration (percent by volume at 15 percent oxygen and on a dry basis);

Y= manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour, and determined to be 14.38 as provided in email; and

F= NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(4) of 40 CFR 60.332.

g. Emission Limitations:

Carbon monoxide (CO) emissions shall not exceed 23 ppmvd at 15% O₂ or emissions of CO shall be reduced by 70% or more.

Applicable Compliance Method:

Unless a performance test is submitted that meets the requirements of 40 CFR 63.6610(d), the permittee shall conduct an initial performance test within 180 days after the compliance date or no later than 11/3/13, to demonstrate compliance with the CO limitation in the NESHAP. The appropriate tests methods from Table 4 to Subpart ZZZZ shall be conducted based on the option chosen for compliance, i.e., the part per million concentration or percent reduction. The appropriate emission and/or operating limitations, required per 40 CFR 63.6630 and identified in Table 5, shall be established and compliance demonstrated during each performance test.



Preliminary Proposed Title V Permit

DP&L, Killen Generating Station

Permit Number: P0091217

Facility ID: 0701000060

Effective Date: To be entered upon final issuance

The temperature at the inlet to the catalyst shall be monitored during the performance test and maintained between 450 °F and 1350 °F. The 3-hour block average temperature at the inlet to the catalyst shall be documented during performance tests and the pressure drop shall be recorded to establish the operating range for the pressure drop across the catalyst. Per 63.6640(b), if the catalyst is changed or the control device replaced, a new performance test must be conducted to demonstrate compliance with the emission limitation and to reestablish the values for or compliance with the operating parameters.

Each performance test shall consist of 3 separate test runs and each test run shall last a minimum of 1 hour and shall be conducted during normal operations. The engine percent load, during the performance test, shall be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load and the estimated percent load shall be included in the notification of compliance.

A compliant performance test shall demonstrate that either the CO emissions have been reduced by 70% or that the average CO concentration is less than or equal to 23 ppmvd, corrected to 15 percent O₂ on a dry basis, and from three 1-hour or longer performance test runs.

If demonstrating compliance with the 70% control requirement for CO, the permittee may use a portable CO and O₂ analyzer at the inlet and outlet of the control device and use ASTM Method D6522-00 to meet the performance testing requirement in Table 4 to Subpart ZZZZ. The CO concentrations at the inlet and outlet of the control device must be normalized to a dry basis and to 15% oxygen, or an equivalent percent CO₂, as required in 40 CFR 63.6620(e).

The following test methods shall be employed to demonstrate compliance with the emission limitation for CO or may be used to demonstrate compliance with the control requirement for CO:

- i. Method 1 or 1A of 40 CFR Part 60, Appendix A to select the sampling port location and the number of traverse points
- ii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A or ASTM Method D6522-00 to measure O₂ at the inlet and outlet of the control device to normalize the CO concentration(s).
- iii. Method 4 of 40 CFR Part 60, Appendix A; or Method 320 of 40 CFR Part 63, Appendix A; or ASTM D6348-03 to measure the moisture content at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure the moisture content of the stationary RICE exhaust.
- iv. Method 10 of 40 CFR Part 60, Appendix A; or Method 320 of 40 CFR Part 63, Appendix A; or ASTM D 6348-03 to measure CO at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure CO at the exhaust of the stationary ICE.



- v. The following equation shall be used to normalize the CO concentrations to a dry basis and to 15 percent oxygen (O₂)**:

$$C_{adj} = C_d (5.9 / 20.9 - \% O_2)$$

Where:

C_{adj}= calculated CO concentration adjusted to 15 percent O₂.

C_d= measured concentration of CO, uncorrected.

5.9 = 20.9 percent O₂ - 15 percent O₂, the defined O₂ correction value, percent.

%O₂ = measured O₂ concentration, dry basis, percent.

** Optionally, the pollutant concentrations can be corrected to 15% O₂ using a CO₂ correction factor, by calculating the fuel factor (F_o value) using Method 19 results obtained during the performance test (40 CFR 63.6620(e)(2)).

- vi. If compliance is demonstrated for the control efficiency for CO, the following equation shall be used to determine the percent reduction:

$$R = (C_i - C_o) / C_i \times 100$$

Where:

C_i= concentration of CO at the control device inlet,

C_o= concentration of CO at the control device outlet, and

R = percent reduction of CO emissions.

If using CEMS to monitor and comply with the CO concentration limitation or requirement to reduce CO emissions, the permittee shall conduct annual relative accuracy test audits (RATA) using Performance Specifications 3 and 4A of 40 CFR Part 60 Appendix B and daily and periodic data quality checks in accordance with 40 CFR Part 60, Appendix F, Procedure 1;

If using a CPMS to demonstrate compliance, the permittee shall conduct subsequent performance tests for CO (concentration or % reduction) every 8,760 hours of operation or every 3 years, whichever comes first.

The permittee shall notify the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency) in writing of each scheduled performance test date or RATA for the CEMS at least 60 calendar days before it is scheduled, to allow the agency time to review and approve the site-specific test plan and to arrange for an observer to be present during the compliance demonstration.



Personnel from the appropriate Ohio EPA District Office or 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.

[40 CFR 63.7(a)(2), (b)(1), and (e)], [40 CFR 63.6600(d)], [40 CFR 63.6610],[40 CFR 63.6615], [40 CFR 63.6620],[40 CFR 63.6630], [40 CFR 63.6640(a) and (b)], [40 CFR 63.6645(a)(3)], [Part 63, Subpart ZZZZ, Table 2c #5; Table 2b; Table 3 #4; Table 4 #1 or #3; Table 5 #1, #2, #5, or #6; and Table 6 #3 or #10], [OAC 3745-110-03(F)(3)], [OAC 3745-110-05(A) and (F)], [OAC rule 3745-15-04(A), and OAC 3745-77-07(C)(1)]

(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 6 months after commencing operation in accordance with PTI P0107275, while firing with biodiesel fuel (B20); unless otherwise approved by the Portsmouth Local Air Agency.
- b. In addition, the emission testing shall be conducted within 6 months after commencing operation in accordance with PTI P0107275, while firing authorized distillate fuel oil (excluding preventative maintenance); unless otherwise approved by the Portsmouth Local Air Agency.
- c. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PM and NO_x when firing with biodiesel fuel (B20), and distillate fuel (without biodiesel) as specified in b)(1)a, b)(1)d and b)(1)f.
- d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) and emission factors:
 - i. for PM: 40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 5 or 17, and the procedures specified in OAC rule 3745-17-03(B)(9); and
 - ii. for NO_x: 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7.

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

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Portsmouth Local Air Agency.
- f. 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).

- g. 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.
- h. 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.

[Authority for term: P0107275 and 3745-77-07(C)(1)]

- (3) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
63.6645	General compliance requirements
63.6610	Testing and initial compliance requirements
63.6615	Conducting subsequent performance tests
63.6620	Performance tests and other procedures
66.6630	Demonstrating initial compliance with emission limitations and operating limits
66.6640	Demonstrating continuous compliance

[Authority for term: 40 CFR Part 63 and 3745-77-07(C)(1)]

- g) Miscellaneous Requirements

- (1) None.



4. F001, Coal Unloading, Transfer, Crushing, & Handling Fac.

Operations, Property and/or Equipment Description:

Coal Handling including barge unloading, coal transfer, conveying, and crushing (coal unloader, bucket ladder, and coal conveyors).

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 rule 3745-31-05(A)(3) (PTI P0105402 issued 5/31/2011)	<p>Fugitive particulate emissions (PE) shall not exceed 12.41 tons/year.</p> <p>Fugitive particulate matter with a diameter equal to or less than 10 microns (PM₁₀) shall not exceed 4.34 tons/year.</p> <p>Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a 3-minute average.</p> <p>The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.</p> <p>See b)(2)a through b)(2)d.</p>

(2) Additional Terms and Conditions

a. The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

barge unloading via coal unloader bucket ladder

coal conveying via belt conveyors



bucket wheel reclaimer to conveyors

primary crushing

- b. The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
barge unloading via coal unloader bucket ladder	partial enclosures and precautionary measures
coal conveying (7 conveyors & 7 transfer points)	partial enclosures and wet suppression
bucket wheel reclaimer (7 conveyors & 8 transfer points)	partial enclosures and wet suppression
primary crushing	partial enclosures and wet suppression

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

- c. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that the use of the control measure(s) is unnecessary.
- d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:



material handling operation(s) minimum inspection frequency

all

weekly

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

- (2) The above-mentioned inspections shall be performed during representative, normal operating conditions.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

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

- a. the date and reason any required inspection was not performed;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
- c. the dates the control measures were implemented;
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures; and
- e. the time of day of each inspection.

The information in d)(3)d shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

- a. each day during which an inspection was not performed by the required frequency; and
- b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

- (2) The quarterly deviation reports shall be submitted in accordance with the requirements specified in Standard Term and Condition A.2.c)(2) of this permit.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]



- (3) 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.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

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:

Fugitive PE shall not exceed 12.41 tons/year.

- Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i through iv below:

- i. barge unloading

Multiply the 0.046 lb/ton emission factor by the annual coal throughput (tons), then multiplying by 0.15, assuming 85% control efficiency for enclosures and precautions, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06, and RACM, Table 2.4-1, dated 09/80. The control efficiency was based on RACM, Table 2.4.2, dated 09/80.

- ii. coal transfer and conveying

Multiply the 0.009 lb/ton emission factor by the annual coal directly fired throughput (tons), then multiplying by 0.10, assuming 90% control efficiency for partial enclosures and wet suppression, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiency was obtained from RACM, Table 2.4.2, dated 09/80.

- iii. coal transfer and conveying (bucket wheel reclaimer)

Multiply the 0.0102 lb/ton emission factor by the annual coal throughput (tons), then multiplying by 0.10, assuming 90% control efficiency for partial enclosures and wet suppression, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06, and RACM, Table 2.19-2 dated 09/80. The control efficiency was obtained from RACM, Table 2.1.2, dated 09/80.

- iv. primary crushing

Multiply the 0.02 lb/ton emission factor by the annual coal throughput (tons), then multiplying by 0.10, assuming 90% control efficiency for



partial enclosures and wet suppression, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiency was obtained from RACM, Table 2.19-3, dated 09/80.

b. Emission Limitation:

Fugitive PM₁₀ emissions shall not exceed 4.34 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i through iv below:

i. barge unloading

Multiply the 0.046 lb/ton emission factor by 0.35 (portion of PE which is PM₁₀) then multiply by the annual coal throughput (tons), then multiplying by 0.15, assuming 85% control efficiency for enclosures and precautions, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06, and RACM, Table 2.4-1, dated 09/80. The control efficiency was obtained from RACM, Table 2.4.2, dated 09/80.

ii. coal transfer and conveying

Multiply the 0.009 lb/ton emission factor by 0.35 (portion of PE which is PM₁₀) then multiply by the coal direct fired annual throughput (tons), then multiplying by 0.10, assuming 90% control efficiency for partial enclosures and wet suppression, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiency was obtained from RACM, Table 2.4.2, dated 09/80.

iii. coal transfer and conveying (bucket wheel reclaimer)

Multiply the 0.0102 lb/ton emission factor by 0.35 (portion of PE which is PM₁₀) then multiply by the annual coal throughput (tons), then multiplying by 0.10, assuming 90% control efficiency for partial enclosures and wet suppression, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiency was obtained from RACM, Table 2.4.2, dated 09/80.

iv. primary crushing

Multiply the 0.02 lb/ton emission factor by 0.35 (portion of PE which is PM₁₀) then multiply by the annual coal throughput (tons), then multiplying by 0.10, assuming 90% control efficiency for partial enclosures and wet suppression, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06, and RACM, Table 2.19-2, dated 09/80. The control efficiency was obtained from RACM, Table 2.19-3, dated 09/80.



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c. Emission Limitation:

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



5. F002, Coal Storage

Operations, Property and/or Equipment Description:

Coal Storage Piles including material load-in (continuous mobile conveyor/stacker), vehicle activity (bulldozer compaction), wind erosion, & material load-out (reclaimer systems: bucket wheel and under pile gravity+ coal transferred to trucks and hauled to Stuart Station).

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 rule 3745-31-05(A)(3) (PTI P0105402 issued 5/31/2011)	<p>Fugitive particulate emissions (PE) shall not exceed 26.01 tons/year.</p> <p>Fugitive particulate matter with a diameter equal to or less than 10 microns (PM₁₀) shall not exceed 9.10 tons/year.</p> <p>There shall be no visible PE except for a period of time not to exceed 1 minute during any 60-minute observation period.</p> <p>The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.</p> <p>See b)(2)a through b)(2)e.</p>

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to maintain minimal drop heights for stackers in lieu of front-loaders, under pile gravity load-out to conveyor, bucket wheel reclaimer to conveyor, bulldozer compaction, and maintenance of a low storage pile height to ensure compliance.



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

- b. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- c. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to maintain minimal drop heights for stackers in lieu of front-loaders, under pile gravity load-out to conveyor, bucket wheel reclaimer to conveyor, bulldozer compaction, and maintenance of a low storage pile height to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all coal piles	weekly

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:



updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

(2) The quarterly deviation reports shall be submitted in accordance with the requirements specified in Standard Term and Condition A.2.c)(2) of this permit.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

(3) 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.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

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. Emissions Limitations:

Fugitive PE shall not exceed 26.01 tons/year.

Applicable Compliance Method:

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

i. material load-in (continuous mobile conveyor/stacker)

Compliance with fugitive PE limitation shall be determined by multiplying the 0.0003 lb/ton emission factor by the annual coal throughput (tons), then multiplying by 0.50, assuming 50% control efficiency for variable height stacker/conveyor, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiency was obtained from RACM, Table 2.18-2, dated 09/80.



ii. wind erosion

Compliance with fugitive PE limitation shall be determined by multiplying the 0.1154 lb/ton emission factor by the annual coal throughput (tons), then multiplying by 0.50, assuming 50% control efficiency for bulldozer compaction/low pile height, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiency was based on RACM, Table 2.1.2-8, dated 09/80.

iii. vehicle activity (bulldozer compaction)

Compliance with fugitive PE limitation shall be determined by multiplying the 0.0202 lb/ton emission factor by the annual coal throughput (tons), then multiplying by 0.50, assuming 50% control efficiency for bulldozer compaction/low pile height, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiency was based on RACM, Table 2.1.2-8, dated 09/80.

iv. material load-out (reclaimer systems: bucket wheel and under pile gravity + coal transferred to trucks and hauled to Stuart Station)

Compliance with fugitive PE limitation shall be determined by multiplying the 0.0015 lb/ton emission factor by the annual coal throughput (tons), then multiplying by 0.20, assuming 80% control efficiency for bucket wheel reclaim, then divided by 2000 and adding that total to the annual coal throughput (tons) of coal transferred to trucks and hauled to Stuart Station using the 0.0015 lb/ton emission factor. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiencies were obtained from RACM, Table 2.4.2, dated 09/80.

b. Emissions Limitations:

Fugitive PM₁₀ emissions shall not exceed 9.10 tons/year.

Applicable Compliance Method:

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

i. material load-in (continuous mobile conveyor/stacker)

Compliance with fugitive PM₁₀ limitation shall be determined by multiplying the 0.0003 lb/ton emission factor by 0.35 (portion of PE which is PM₁₀) by the annual coal throughput(tons), then multiplying by 0.50, assuming 50% control efficiency for variable height stacker/conveyor, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiency was obtained from RACM, Table 2.18-2, dated 09/80.



ii. wind erosion

Compliance with fugitive PM₁₀ limitation shall be determined by multiplying the 0.1154 lb/ton emission factor by 0.35 (portion of PE which is PM₁₀) by the annual coal throughput (tons), then multiplying by 0.50, assuming 50% control efficiency for bulldozer compaction/low pile height, then divided by 2000. The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiency was based on RACM, Table 2.1.2-8, dated 09/80.

iii. vehicle activity (bulldozer compaction)

Compliance with fugitive PM₁₀ limitation shall be determined by multiplying the 0.0202 lb/ton emission factor by 0.35 (portion of PE which is PM₁₀) by the annual coal throughput (tons), then multiplying by 0.50, assuming 50% control efficiency for bulldozer compaction/low pile height, then divided by 2000. The particulate emission factors were calculated AP-42 Section 13.2.4, dated 11/06. The control efficiency was based on RACM, Table 2.1.2-8, dated 09/80.

iv. material load-out (reclaimer systems: bucket wheel and under pile gravity + coal transferred to trucks and hauled to Stuart Station)

Compliance with fugitive PM₁₀ limitation shall be determined by multiplying the 0.0015 lb/ton emission factor by 0.35 (portion of PE which is PM₁₀) by the annual coal throughput (tons), then multiplying by 0.20, assuming 80% control efficiency for bucket wheel reclaim, then divided by 2000 and adding that total to the annual coal throughput (tons) of coal transferred to trucks and hauled to Stuart Station using the 0.0015 lb/ton emission factor multiplied by 0.35 (portion of PE which is PM₁₀). The particulate emission factors were calculated using AP-42 Section 13.2.4, dated 11/06. The control efficiencies were obtained from RACM, Table 2.4.2, dated 09/80.

c. Emission Limitation:

There shall be no visible PE except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in Appendix on Test Methods in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources).

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



6. F003, Plant Grounds, Roadways, and Parking Areas

Operations, Property and/or Equipment Description:

Paved and Unpaved roadways and parking areas

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 rule 3745-31-05(A)(3) (PTI P0105402 issued 5/31/2011)	<p>Fugitive particulate emissions (PE) shall not exceed 41.09 tons/year.</p> <p>Fugitive particulate matter with a diameter equal to or less than 10 microns (PM10) shall not exceed 8.17 tons/year.</p> <p>There shall be no visible PE from unpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.</p> <p>There shall be no visible PE from paved roadways and parking areas except for a period not to exceed 1 minute during any 60-minute observation period.</p> <p>The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.</p> <p>See b)(2)a through b)(2)e.</p>



(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved and unpaved roadways and parking areas by watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved and unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- c. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- d. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all roads and parking areas	weekly
<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all roads and parking areas	weekly

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]



- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

- (2) The quarterly deviation reports shall be submitted in accordance with the requirements specified in Standard Term and Condition A.2.c)(2) of this permit.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]



- (3) 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.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

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 Limitations:

Fugitive PE shall not exceed 41.09 tons/year.

Applicable Compliance Method:

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

i. paved roads and parking areas

Compliance shall be demonstrated by multiplying the annual vehicle miles traveled (VMT) per year for the average vehicle fleet weight-14.8 tons, times the uncontrolled/VMT emission factor 2.59 lb/VMT, times 0.50, assuming a 50% control efficiency for watering the roads as needed, then dividing by 2,000 pounds/ton. The particulate emission factors were calculated AP-42 Section 13.2.1, Equation (1), dated 11/06. The control efficiency was obtained from RACM, Table 2.1.1-3, dated 08/83.

ii. unpaved roads and parking areas

Compliance for the unpaved roadway emissions shall be demonstrated by multiplying the annual vehicle miles traveled (VMT) for the year for the average vehicle fleet weight-3.0 tons, times the 2.59 lb/VMT emission factor, and then dividing by 2,000 pounds/ton. The particulate emission factors were calculated AP-42 Section 13.2.2, Equation (1), dated 12/03.

b. Emission Limitations:

Fugitive PM₁₀ emissions shall not exceed 8.17 tons/year.

Applicable Compliance Method:

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

i. paved roads and parking areas

Compliance for the paved roadway emissions shall be demonstrated by multiplying the annual vehicle miles traveled (VMT) per year for the average vehicle fleet weight-14.8 tons, times the uncontrolled PM₁₀



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emission factor 0.51 lb/VMT, times 0.50, assuming a 50% control efficiency for watering the roads as needed, and then dividing by 2,000 pounds/ton. The particulate emission factors were calculated using AP-42 Section 13.2.1, dated 11/06. The control efficiency was obtained from RACM, Table 2.1.1-3, dated 08/83.

ii. unpaved roads and parking areas

Compliance for the unpaved roadway emissions shall be demonstrated by multiplying the annual vehicle miles traveled (VMT) per year for the average vehicle fleet weight-3.0 tons, times the 0.63 lb/VMT emission factor, and then dividing by 2,000 pounds/ton. The particulate emission factors were calculated AP-42 Section 13.2.2, Equation (1), dated 12/03.

c. Emission Limitation:

There shall be no visible PE from unpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

d. Emission Limitation:

There shall be no visible PE from paved roadways and parking areas except for a period not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

[Authority for term: P0105402 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



7. F004, FGD Material Handling

Operations, Property and/or Equipment Description:

Flue gas desulfurization (FGD) material handling, transfer, conveying, silos, and wet ball mills - Limestone and gypsum handling system.

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 rule 3745-31-05(A)(3) (PTI P0103654 issued 3/29/2011)	<p>PE from the FGD material handling system, transfer, conveying, silos, wet ball mills and screens shall not exceed 3.04 pounds per hour.</p> <p>PM10 from the FGD material handling system, transfer, conveying, silos, wet ball mills and screens shall not exceed 1.42 pounds per hour.</p> <p>PE from the FGD material handling system, transfer, conveying, silos, wet ball mills and screens shall not exceed 13.31 tons per year.</p> <p>PM10 from the FGD material handling system, transfer, conveying, silos, wet ball mills and screens shall not exceed 6.26 tons per year.</p> <p>The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust</p> <p>See b)(2)a. through b)(2)e.</p> <p>The requirements of this rule also include</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		compliance with the requirements of 40 CFR 60.672.
b.	40 CFR 60.672 (NSPS Subpart OOO)	<p>No owner or operator shall cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emission which contains particulate matter in excess of 0.022 gr/dscf.</p> <p>No owner or operator shall cause to be discharged into the atmosphere from any baghouse that controls emissions from only an individual, enclosed storage bin, stack emissions which exhibit greater than 7 percent opacity.</p> <p>No owner or operator shall cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any fugitive emissions which exhibit greater than 10 percent opacity.</p> <p>See b)(2)f and b)(2)g.</p>

(2) Additional Terms and Conditions

- a. The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

Limestone handling system, from the barge unloading through the handling process, limestone silos, wet ball mills and screens, as described in the PTI 07-00559 application received on August 10th, 2005.

Gypsum handling system, from reclaim hopper, through the handling process, shuttle conveyor, and barge loading process, as described in the PTI 07-00559 application received on August 10th, 2005.

- b. The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:



material handling operation(s)

control measure(s)

Limestone handling

a combination of precautionary measures, partial enclosure of conveyor, telescoping chute, and fabric filter

Gypsum handling system

a combination of precautionary measures, partial enclosure of conveyor, maintaining appropriate moisture content and telescoping chute.

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

- c. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- e. The hourly emission limitations outlined in b)(1)a. for PE and PM10 are based on the emissions unit's Potential to Emit. Therefore, no hourly records are required to demonstrate compliance with these limits.
- f. The following equipment associated with F001 is subject to 40 CFR 60.672, Subpart OOO: limestone reclaim feeder, limestone reclaim conveyor, silo feed conveyors, limestone storage silo bin vent filters, limestone feeders, and wet ball mills.
- g. If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affect facility must comply with the emission limits in 40 CFR 60.672(a), (b), and (c), or the building enclosing the affected facility or facilities must comply with the following emission limits:
 - i. No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions except emissions from a vent as defined in 40 CFR 60.671.
 - ii. No owner or operator shall cause to be discharged into the atmosphere from any vent of any building enclosing any transfer point on a conveyor belt or any other affected facility emissions which exceed the stack emissions limits in 40 CFR 60.672(a).



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
Limestone handling system	weekly
Gypsum handling system	weekly

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (2) The above-mentioned inspections shall be performed during representative, normal operating conditions.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

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

- a. the date and reason any required inspection was not performed;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
- c. the dates the control measure(s) was (were) implemented; and
- d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in d)(3) shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

- a. each day during which an inspection was not performed by the required frequency; and
- b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.



[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (2) The quarterly deviation reports shall be submitted in accordance with the requirements specified in Standard Term and Condition A.2.c)(2) of this permit.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

f) **Testing Requirements**

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

a. Emissions Limitations:

PE from the FGD material handling system, transfer, conveying, silos, wet ball mills and screens shall not exceed 3.04 pounds per hour.

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's maximum potential to emit and the emissions data found in PTI 07-00559 submitted August 10th, 2005.

b. Emissions Limitations:

PM₁₀ from the FGD material handling system, transfer, conveying, silos, wet ball mills and screens shall not exceed 1.42 pounds per hour.

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's maximum potential to emit and the emissions data found in PTI 07-00559 submitted August 10th, 2005.

c. Emissions Limitations:

PE from the FGD material handling system, transfer, conveying, silos, wet ball mills and screens shall not exceed 13.31 tons per year.

Applicable Compliance Method:

Compliance with the annual limitations shall be demonstrated by the emission factors, and control efficiencies as submitted in PTI application 07-00559, received August 10th, 2005.

d. Emission Limitation:

PM₁₀ from the FGD material handling system, transfer, conveying, silos, wet ball mills and screens shall not exceed 6.26 tons per year.



Applicable Compliance Method:

Compliance with the annual limitations shall be demonstrated by the emission factors, and control efficiencies as submitted in PTI application 07-00559, received August 10th, 2005.

e. Emission Limitation:

No owner or operator shall cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emission which contains particulate matter in excess of 0.022 g/dscf.

Applicable Compliance Method:

In determining compliance with section 60.672(a) the owner or operator shall use Method 5 or Method 17 to determine the particulate matter concentration. The sample volume shall be at least 60 dscf. If Method 5 is used, the gas stream being sampled must be at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at temperature high enough, but no higher than 250 degree F to prevent water condensation on filter.

f. Emission Limitation:

No owner or operator shall cause to be discharged into the atmosphere from any baghouse that controls emissions from only an individual, enclosed storage bin, stack emissions which exhibit greater than 7 percent opacity

Applicable Compliance Method:

In determining compliance with section 60.672(f) the owner or operator shall use procedures in 60.11 and Method 9. The duration of observations shall be 1 hour (ten 6-minute averages).

g. Emission Limitation:

No owner or operator shall cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affect facility any fugitive emissions which exhibit greater than 10 percent opacity.

Applicable Compliance Method:

In determining compliance with section 60.672(b) the owner or operator shall use procedures in 60.11 and Method 9. The duration of observations shall be 3 hours (thirty 6-minute averages). Observations may be reduced to 1 hour (ten 6-minute averages) only if there are no individual readings greater than 10 percent opacity and there are no more than 3 readings of 10 percent for the 1-hour period. The minimum distance between the observer and the emission source shall be 15 feet. The observer shall minimize interference from other fugitive emission sources. When a water mist from dust suppression is in use, the observation of



emissions is to be made at a point in the plume where the mist is no longer visible.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (2) Compliance with the emission limitation in Section b)(2)g.i. of these terms and conditions shall be determined by using Method 22 to determine fugitive emissions. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (3) 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 issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulates.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1 through 4, 5 or 17, and 9 for particulates.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate OhioEPA District Office or local air agency.

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 Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Portsmouth Local Air Agency Office's refusal to accept the results of the emission test(s).

Personnel from the Portsmouth Local Air Agency Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Portsmouth Local Air Agency Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written



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report, where warranted, with prior approval from the Portsmouth Local Air Agency.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



8. F005, FGD Material Storage

Operations, Property and/or Equipment Description:

Limestone and gypsum storage piles - load-in and load out of storage piles and wind erosion from storage piles.

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 rule 3745-31-05(A)(3) (PTI P0103654 issued 3/29/2011)	<p>There shall be no visible particulate emissions except for one minute during any 60-minute period.</p> <p>The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)b through b)(2)f.</p> <p>PE from the limestone and gypsum storage piles-load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 7.09 tons per year.</p> <p>PM₁₀ from the limestone and gypsum storage piles-load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 4.38 tons per year.</p> <p>See b)(2)g.</p>



(2) Additional Terms and Conditions

- a. The storage piles that are covered by this permit and subject to the above-mentioned requirements are listed below:

All limestone and gypsum storage piles

- b. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to the use of a telescoping chute, maintaining material moisture content, and precautionary measures (reduce drop heights) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- d. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to precautionary measures including pile height control, reducing disturbed area, and maintaining moisture content to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- g. The annual emissions limitations for PE and PM₁₀ outlined are based upon the maximum production limitations established for the FGD material handling, transfer and conveying - Limestone and gypsum handling system.



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

storage pile identification minimum load-in inspection frequency

All limestone storage piles weekly

All gypsum storage piles weekly

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

storage pile identification minimum load-out inspection frequency

All limestone storage piles weekly

All gypsum storage piles weekly

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification minimum wind erosion inspection frequency

All limestone storage piles weekly

All gypsum storage piles weekly

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (5) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind



erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d)(6) shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on calendar quarter basis within 30 days after the end of each calendar quarter.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (2) The quarterly deviation reports shall be submitted in accordance with the requirements specified in Standard Term and Condition A.2.c)(2) of this permit.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit annual reports that specify the total PE and PM₁₀ emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]



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 Limitations:

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

Applicable Compliance Method:

If required, compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

b. Emission Limitations:

PE from the limestone and gypsum storage piles load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 7.09 tons per year.

Applicable Compliance Method:

Compliance with the annual limitations shall be demonstrated by the emission factors, and control efficiencies as identified in PTI P0103654, issued on March 29th, 2011.

c. Emission Limitations:

PM₁₀ from the limestone and gypsum storage piles load-in and load-out of storage piles and wind erosion from storage piles shall not exceed 4.38 tons per year.

Applicable Compliance Method:

Compliance with the annual limitations shall be demonstrated by the emission factors, and control efficiencies as identified in PTI P0103654, issued on March 29th, 2011.

[Authority for term: P0103654 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



9. 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. (PTI P0106613 issued 2/21/2012)	<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>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Fugitive PM_{2.5} shall not exceed 0.07 ton per year. (conveyor)</p> <p>See b)(2)a and b)(2)c.</p> <p>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.</p>
b.	OAC paragraph 3745-31-05(A)(3), as effective 12/01/06. (PTI P0106613 issued 2/21/2012)	See b)(2)b.
c.	OAC rule 3745-31-05(D) (PTI P0106613 issued 2/21/2012)	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 system** shall be installed within 12 months after commencing operation of this emissions unit in accordance with PTI P0106613.

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 after commencing operation in accordance with PTI P0106613, the permittee shall not exceed the operating usage 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.



[Authority for term: P0106613 and OAC rule 3745-77-07(A)(1)]

- (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.

[Authority for term: P0106613 and OAC rule 3745-77-07(A)(1)]

- (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.

[Authority for term: P0106613 and OAC rule 3745-77-07(A)(1)]

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 commencing operation in accordance with PTI P0106613, 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 commencing operation in accordance with PTI P0106613, the permittee shall record the cumulative usage of wood/grass briquettes, or other approved clean cellulosic biomass, in tons, for each calendar month.

[Authority for term: P0106613 and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and



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

[Authority for term: P0106613 and OAC rule 3745-77-07(C)(1)]

- (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.

[Authority for term: P0106613 and OAC rule 3745-77-07(C)(1)]

- (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:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;



- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. 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.

[Authority for term: P0106613 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month limitation on the renewable fuel usage for this emissions unit; and for the first 12 calendar months after commencing operation in accordance with PTI P0106613, all exceedances of the maximum allowable cumulative tons of renewable fuel.

[Authority for term: P0106613 and OAC rule 3745-77-07(C)(1)]

- (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.

[Authority for term: P0106613 and OAC rule 3745-77-07(C)(1)]

- (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



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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.

[Authority for term: P0106613 and OAC rule 3745-77-07(C)(1)]

- (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.

[Authority for term: P0106613 and OAC rule 3745-77-07(C)(1)]

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 ton 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 0.37 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 (0.013 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.

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.

[Authority for term: P0106613 and OAC rule 3745-77-07(C)(1)]

(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 PTI P0106613; unless otherwise approved by the Portsmouth Local Air Agency
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, as specified in b)(1)a under permanent 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



Preliminary Proposed Title V Permit

DP&L, Killen Generating Station

Permit Number: P0091217

Facility ID: 0701000060

Effective Date: To be entered upon final issuance

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.

[Authority for term: P0106613 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.