



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

3/28/2013

John Hendricks  
General James M. Gavin Power Plant  
1 Riverside Plaza  
Columbus, OH 43215-2373

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0627010056  
Permit Number: P0111468  
Permit Type: OAC Chapter 3745-31 Modification  
County: Gallia

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Gallipolis Daily Tribune. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://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 draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification  
Ohio EPA-SEDO; Kentucky; West Virginia

Certified Mail

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

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install  
General James M. Gavin Power Plant

Issue Date: 3/28/2013  
Permit Number: P0111468  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Description: Chapter 31 modification of the Reduced Emissions Fuel (REF) Material Handling System and the facility's Roadways and Parking areas. Changes to the REF material handling system include consolidating from two processing lines into a single processing line which includes a new crushing building in addition to the new pugmill. The proposed new design for the REF material handling operation consists of four material conveyors, three process enclosures, a non-regulated liquid material storage tank and a dry material storage silo.  
Facility ID: 0627010056  
Facility Location: General James M. Gavin Power Plant  
7397 N. St Rt #7, Attn: D. E. Workman  
Cheshire, OH 45620-0271  
Facility Description: Fossil Fuel Electric Power Generation, Solid Waste Landfill

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Dean Ponchak, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This is a fossil Fuel Electric Power Generation facility. The facility currently has the following significant emissions units: B001 (Unit 1 Auxiliary Boiler), B002 (Unit 2 Auxiliary Boiler), B003 (Unit 1 Main Boiler) Electric generation, B004 (Unit 2 Main Boiler) Electric generation F001 (Coal Handling System), F002 (Coal & FGD Storage), F003 (Roadways & Parking), F004 (Lime handling Systems), and F005 (Ash Handling System). The facility is proposing to modify the material handling equipment by adding a Reduced Emissions Fuel handling system to the current coal handling system. The proposed new design for the REF material handling operation consists of four material conveyors, three process enclosures, a non-regulated liquid material storage tank and a dry material storage silo. The resulting potential emissions from this change are slightly less than those recently permitted under PTI No P0108666 when limiting the throughput to 13,000,000 tons per year. Therefore, to ensure that the redesigned process does not increase emissions above those permitted under PTI No. P0108666, a production limit of 13,000,000 tons of coal per year is proposed for the REF material handling system. Compliance with this restriction will ensure that the annual emissions increase from the REF material handling system above the existing coal handling operations will not exceed 1.6 tons per year of PM10.

3. Facility Emissions and Attainment Status:

The facility is currently a Title V facility. This facility is major for both PM10 and PM2.5. The city of Cheshire (located in Gallia County) is attainment for PM-10 and PM-2.5. The federally-enforceable restriction will limit the potential to emit from triggering new major requirements.

4. Source Emissions:

See above.

5. Conclusion:

The federally enforceable restriction on coal throughput through the REF Material Handling will ensure that no new major requirements are triggered.

6. Please provide additional notes or comments as necessary:

None



7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PM-10	18.75 (chp 31 modification increase of 1.6 tons/year)
PM-2.5	2.84 (chp 31 modification increase of 0.99)



**DRAFT**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
General James M. Gavin Power Plant

Facility ID:	0627010056
Permit Number:	P0111468
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	3/28/2013
Effective:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
General James M. Gavin Power Plant

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. Federally Enforceable Standard Terms and Conditions .....	4
2. Severability Clause .....	4
3. General Requirements .....	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting .....	6
6. Compliance Requirements .....	6
7. Best Available Technology .....	7
8. Air Pollution Nuisance .....	7
9. Reporting Requirements .....	7
10. Applicability .....	8
11. Construction of New Sources(s) and Authorization to Install .....	8
12. Permit-To-Operate Application .....	9
13. Construction Compliance Certification .....	9
14. Public Disclosure .....	9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations .....	10
16. Fees.....	10
17. Permit Transfers .....	10
18. Risk Management Plans .....	10
19. Title IV Provisions .....	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions .....	13
1. F001, Coal Handling System.....	14
2. F003, Roadways & Parking.....	23





**Draft Permit-to-Install**  
General James M. Gavin Power Plant  
**Permit Number:** P0111468  
**Facility ID:** 0627010056  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0627010056  
Facility Description: Power Generating Plant  
Application Number(s): A0045823  
Permit Number: P0111468  
Permit Description: Chapter 31 modification of the Reduced Emissions Fuel (REF) Material Handling System and the facility's Roadways and Parking areas. Changes to the REF material handling system include consolidating from two processing lines into a single processing line which includes a new crushing building in addition to the new pugmill. The proposed new design for the REF material handling operation consists of four material conveyors, three process enclosures, a non-regulated liquid material storage tank and a dry material storage silo.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$1,450.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 3/28/2013  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

General James M. Gavin Power Plant  
7397 N. St Rt #7  
Attn: D. E. Workman  
Cheshire, OH 45620-0271

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



**Draft Permit-to-Install**  
General James M. Gavin Power Plant  
**Permit Number:** P0111468  
**Facility ID:** 0627010056  
**Effective Date:** To be entered upon final issuance

## Authorization (continued)

**Permit Number:** P0111468  
**Permit Description:** Chapter 31 modification of the Reduced Emissions Fuel (REF) Material Handling System and the facility's Roadways and Parking areas. Changes to the REF material handling system include consolidating from two processing lines into a single processing line which includes a new crushing building in addition to the new pugmill. The proposed new design for the REF material handling operation consists of four material conveyors, three process enclosures, a non-regulated liquid material storage tank and a dry material storage silo.

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

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	Coal Handling System
Superseded Permit Number:	P0108666
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Roadways & Parking
Superseded Permit Number:	P0108928
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install**  
General James M. Gavin Power Plant  
**Permit Number:** P0111468  
**Facility ID:** 0627010056  
**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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

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

## **3. General Requirements**

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



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

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

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



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

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

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

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



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

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **10. Applicability**

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

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

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



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

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

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

## **13. Construction Compliance Certification**

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

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

## **14. Public Disclosure**

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



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

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

**16. Fees**

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

**17. Permit Transfers**

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

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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



**Draft Permit-to-Install**  
General James M. Gavin Power Plant  
**Permit Number:** P0111468  
**Facility ID:** 0627010056  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install**  
General James M. Gavin Power Plant  
**Permit Number:** P0111468  
**Facility ID:** 0627010056  
**Effective Date:** To be entered upon final issuance

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.



**Draft Permit-to-Install**  
General James M. Gavin Power Plant  
**Permit Number:** P0111468  
**Facility ID:** 0627010056  
**Effective Date:** To be entered upon final issuance

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



**1. F001, Coal Handling System**

**Operations, Property and/or Equipment Description:**

Modification of the existing coal handling system by the addition of the REF Material Handling System. The throughput of the coal processed in the REF Material Handling System is limited to 13,000,000 tons per year. In processing the coal, 130,000 ton per year dry REF material may be added. The total emissions increase from the REF Material Handling System project is 1.6 tons per year of particulate matter. The rest of the existing coal handling system does not change except as modified above.

- 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(D)	<p>There shall be no visible particulate emissions (PE) of fugitive dust emitted from the material handling, conveying/transfer points and/or the area immediately above the capture systems serving this emissions unit.</p> <p>The PE from the baghouse and/or bin vent filters associated with this emissions unit shall not exceed 0.010 grain per dry standard cubic feet of the exhaust gases, or there shall be no visible PE from the baghouses and/or bin vent filters.</p> <p>See c)(1).</p>
b.	ORC 3704.03(T)	<p>Particulate matter 10 microns in diameter or less (PM-10) emissions shall not exceed 18.75 tons/rolling, 12-month summation.</p> <p>Particulate matter 2.5 microns in diameter or less (PM-2.5) emissions shall not exceed 2.84 tons/rolling, 12-month summation.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)(5)	None. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	None. This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
e.	40 CFR Part 60, Subpart Y [40 CFR 60.254(b)(1)]	The owner or operator must not cause to be discharged into the atmosphere from the affected facility any gases which exhibit 10 percent (%) opacity or greater.  The opacity limit specified pursuant to this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(D).
f.	40 CFR 60.1-19 (40 CFR 60.1(a))	The provisions of Subpart A apply to the owner or operator of any stationary source which contains an affected facility that commenced construction or modification after the date of publication in 40 CFR Part 60 that is applicable to that facility.

(2) Additional Terms and Conditions

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

Material Handling, Conveying/Transfer Points

North Barge Unloader Bucket to RN  
 Conveyor RN to R1N  
 Conveyor R1N to 12N  
 Conveyor 12N to 24  
 South Barge Unloader Bucket to RS  
 Conveyor RS to 1RS  
 Conveyor 1RS to 2RS  
 Conveyor 2RS to 24  
 Conveyor 24 to 46  
 Conveyor 46 to 67  
 Conveyor 67 to Radial Stacker



Rail Car Dump to T12  
Conveyor T12 to T23  
Conveyor T23 to 64  
Conveyor 64 to 46  
Under pile Feeders to 7N or 7S  
Conveyor 7N or 7S to 77N or 77S  
Conveyor 77N or 77S to 77BN or 77BS  
Conveyor 77BN or 77BS to Crushers  
Crushers to 78N or 78S  
Conveyor 78N or 78S to 8A  
Conveyor 8A to AB  
Conveyor AB to Tripper Conveyors  
Conveyor 78N or 78S to 89  
Conveyor 89 to 9F  
Conveyor 9F to FD  
Conveyor FD to DC  
Conveyor DC to Tripper Conveyor

REF Material Handling System (Subject to Part 60 Subpart Y)

Transfer from Existing Conveyors 77BS or 77BN to short conveyor  
Transfer from short conveyor to crusher feed conveyor  
Transfer from crusher feed conveyor to crushers  
Transfer from crushers to pug mill feed conveyor  
Transfer from pug mill feed conveyor to pug mill  
Transfer from pug mill to product conveyor  
Transfer from product conveyor to Existing Conveyor 78N or 78S

Additional REF Material Handling System - Additive Handling

Pneumatic transfer from truck to silo  
Transfer from silo to day bin  
Transfer from day bin to screw conveyor  
Transfer from screw conveyor to pug mill

- b. The permittee shall employ best available control measures for the coal and REF material handling operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee shall perform the following control measures to ensure compliance: maintain sufficient moisture to prevent fugitive dust, treat the coal with chemical stabilization/dust suppressants at sufficient frequencies, employ bin vent filters and maintain enclosures. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- c. For each coal and REF Material Handling System operation that is not adequately enclosed, the above-identified control measures 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 measures are



necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the coal and REF Material Handling System operations until further observation confirms that use of the control measures is unnecessary.

- d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit are appropriate and sufficient to satisfy the best available control measures of ORC 3704.03(T).

c) Operational Restrictions

- (1) The amount of coal processed through the REF Material Handling System shall not exceed 13,000,000 tons per year, based upon a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the monthly amounts of coal processed through the REF Material Handling System specified in the following table:

Month	Cumulative Tons of Coal Processed
1	2,000,000
1-2	3,000,000
1-3	4,000,000
1-4	5,000,000
1-5	6,000,000
1-6	7,000,000
1-7	8,000,000
1-8	9,000,000
1-9	10,000,000
1-10	11,000,000
1-11	12,000,000
1-12	13,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the tons coal processed through the REF Material Handling System shall be based upon a rolling, 12-month summation of the monthly tons of processed coal.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible particulate emissions from the material handling, conveying/transfer points listed in b)(2)a. and from the area immediately above the capture system 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. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of coal processed through the REF Material Handling System, in tons;
  - b. for the first 12 calendar months of operation following the issuance of this permit, the monthly cumulative amount of coal processed, in tons;
  - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of coal processed through the REF Material Handling System, in tons; and
  - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month PM-10 and PM-2.5 emission summations, in tons (calculated in accordance with the methods and procedures as outlined in permit application number A0045823as submitted on October 10, 2012 and the information recorded in d)(2)c above.
- (3) The owner or operator of a coal preparation and processing plant that commenced construction, reconstruction, or modification after April 28, 2008, shall maintain in a logbook (written or electronic) on-site and make it available upon request. The logbook shall record the following:
  - a. The manufacturer's recommended maintenance procedures and the date and time of any maintenance and inspection activities and the results of those activities. Any variance from manufacturer recommendation, if any, shall be noted.
  - b. The date and time of periodic coal preparation and processing plant visual observations, noting those sources with visible emissions along with corrective actions taken to reduce visible emissions. Results from the actions shall be noted.



- c. The amount and type of coal processed each calendar month.
- d. The amount of chemical stabilizer or water purchased for use in the coal preparation and processing plant.
- e. Monthly certification that the dust suppressant systems were operational when any coal was processed and that manufacturer's recommendations were followed for all control systems. Any variance from the manufacturer's recommendations, if any, shall be noted.

40 CFR Part 60, Subpart Y [40 CFR 60.258(a)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible emissions of fugitive dust were observed from the material handling, conveying/transfer points listed in b)(2)a. and the area immediately above the capture system serving this emissions unit; and
- b. any corrective actions taken to eliminate the visible emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

- a. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the restriction on the monthly cumulative amount of coal processed;
- b. beginning after the first 12 calendar months of operation following the issuance of this permit, all exceedances of the rolling, 12-month restriction on the amount of coal processed through the REF Material handling System; and
- c. beginning after the first 12 calendar months of operation following the issuance of this permit, all exceedances of the rolling, 12-month emission limitations for PM-10 and PM-2.5.

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

(3) For the purpose of reports required under section 60.7(c), any owner operator subject to the provisions of this subpart also shall report semiannually periods of excess emissions as follow:

- a. All 6-minute average opacities that exceed the applicable standard.

40 CFR Part 60, Subpart Y (40 CFR 60.255(b)(3))



- (4) The owner or operator of an affected facility shall submit the results of initial performance tests to the Administrator or delegated authority, consistent with the provisions of section 60.8. The owner or operator who elects to comply with the reduced performance testing provisions of sections 60.255(c) or (d) shall include in the performance test report identification of each affected facility that will be subject to the reduced testing. The owner or operator electing to comply with section 60.255(d) shall also include information which demonstrates that the control devices are identical.

40 CFR Part 60, Subpart Y [40 CFR 60.258(c)]

- (5) After July 1, 2011, within 60 days after the date of completing each performance evaluation conducted to demonstrate compliance with this subpart, the owner or operator of the affected facility must submit the test data to EPA by successfully entering the data electronically into EPA's WebFIRE data base available at <http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main>. For performance tests that cannot be entered into WebFIRE (i.e., Method 9 of appendix A-4 of this part opacity performance tests) the owner or operator of the affected facility must mail a summary copy to United States Environmental Protection Agency; Energy Strategies Group; 109 TW Alexander DR; mail code: D243-01; RTP, NC 27711.

40 CFR Part 60, Subpart Y [40 CFR 60.258(d)]

- (6) Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
- a. construction date (no later than 30 days after such date);
  - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. actual start-up date (within 15 days after such date); and
  - d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

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

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:

There shall be no visible particulate emissions of fugitive dust emitted from the material handling, conveying/transfer points and/or the area immediately above the capture systems serving this emissions unit.

Applicable Compliance Method:

If required, compliance with the visible particulate emissions limitation for the fugitive dust identified in this permit 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").

b. Emission Limitation:

Particulate emissions from baghouses and/or bin vent filters shall not exceed 0.010 grain per dry standard cubic feet.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Methods 1-5 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

c. Emission Limitations:

PM-10 shall not exceed 18.75 tons/rolling, 12-month summation  
PM-2.5 shall not exceed 2.84 tons/rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the PM-10 and PM-2.5 emission limitations above in accordance with the record keeping requirements in section d)(2).

d. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the opacity limitation above in accordance with USEPA Method 9 of 40 CFR Part 60, Appendix A.

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

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



- b. The emission testing shall be conducted in accordance with the requirements as outlined in 40 CFR 60.255 and 60.257(a).
- c. The emission testing shall be conducted to demonstrate compliance with the allowable visible PE limitation.
- d. The following test method(s) shall be employed to demonstrate compliance with the allowable visible PE:

Compliance with the visible PE limitation shall be determined in accordance with Test Method 9(or Method 22 for a no VE limitation) as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

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 appropriate Ohio EPA District Office or 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 appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. 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.

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 appropriate Ohio EPA District Office or 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 appropriate Ohio EPA District Office or local air agency.

- g) Miscellaneous Requirements
  - (1) None.



**2. F003, Roadways & Parking**

**Operations, Property and/or Equipment Description:**

Chapter 31 Modification to Existing Roadways (Plant and Landfill Paved & 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.	ORC 3704.03 (T)	There shall be no visible particulate emissions from any paved roadway or parking area except for one minute during any 60-minute period.  There shall be no visible particulate emissions from any unpaved roadway or parking area except for three minutes during any 60-minute period.  See b)(2)a. through b)(2)e.
b.	OAC rule 3745-17-07(B)(5)	None. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
c.	OAC rule 3745-17-08(B)	None. This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

(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 application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective 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 ORC 3704.03 (T).

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>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all roadways and parking areas	daily (when in operation)

- (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.

- (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.
- (4) 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.

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.
- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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 from any paved roadway or parking area except for one minute during any 60-minute period.

There shall be no visible particulate emissions from any unpaved roadway or parking area except for three minutes during any 60-minute period.



**Draft Permit-to-Install**

General James M. Gavin Power Plant

**Permit Number:** P0111468

**Facility ID:** 0627010056

**Effective Date:** To be entered upon final issuance

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitations 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"). Miscellaneous Requirements

g) Miscellaneous Requirements

(1) None.