Synthetic Minor Determination and/or □ Netting Determination
Permit To Install: "01-01324"

A. Source Description

Delphi operates three coal-fired boilers at their Delphi Interior Systems facility located in Franklin County. Delphi has requested a federally enforceable permit to their existing coal-burning boilers (B001 through B003) to limit their potential HAP emissions to below 10 tons, combined, for the purpose of avoiding MACT. The company has requested to limit their hydrogen chloride (HCl) emissions instead of total HAPs as this is the HAP of concern. B001, B002 and B003 have not been physically modified.

B. Facility Emissions and Attainment Status

Delphi Thermal & Interior Systems - Columbus Operations is a Title V facility. The facility is located in Franklin County which is currently non-attainment for ozone and PM2.5 emissions. This PTI is to specify a synthetic minor limitation for three coal boilers to reduce the facility's potential HAP emissions, and thus would exempt the facility from Subpart DDDDD. Potential emissions of HCl from the three coal-fired boilers at the Delphi facility are the HAP of concern and would exceed the MACT major threshold of 10 tons per year for an individual HAP. Delphi has requested federally enforceable limitations on HCl for the purpose of avoiding MACT applicability.

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters MACT, 40 CFR Part 63, Subpart DDDDD was promulgated September 13, 2004. Without this SM limitation in this PTI, the permittee would be subject to the MACT requirements. The requirements of this synthetic minor will limit the facility's HAPS emissions allowing it to avoid the MACT requirements.

C. Source Emissions

The highest potential emissions of a single HAP for the facility is HCl, all of which originates from the burning of coal in B001 through B003. This permit limits HCl emissions by establishing restrictions on the amount of coal that can be fired in the boilers at the facility. The amount of coal that can be burned will be dependent on the chlorine content in the coal and the option to apply fuel additives to control HCl emissions. Delphi voluntarily requested federally enforceable limitations limiting the combined HCL emissions from these boilers, By restricting the coal throughput of the boilers, to less that MACT applicability threshold of10 ton/yr for a single HAP.

D. Conclusion

This is a synthetic minor PTI containing federally enforceable requirements to ensure the HAP emissions for the facility are maintained below MACT thresholds at 10 TPY for a single HAP compound and 25 TPY for combined HAP compounds. Monthly monitoring, record keeping and quarterly deviation reporting will be required to monitor compliance. Therefore, through federally enforceable terms and conditions and record keeping requirements, Delphi Thermal & Interior Systems - Columbus will not trigger MACT requirements.

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

RE: DRAFT PERMIT TO INSTALL
FRANKLIN COUNTY
Application No: 01-01324
Fac ID: 0125040057

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 9/18/2007

Delphi Safety and Interior Systems
Cliff Nunn
200 Georgesville Road
Columbus, OH 43228

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$1600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **CDO** **MID-OHIO REG PLANNING COMM**

FRANKLIN COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **01-01324** FOR AN AIR CONTAMINANT SOURCE
FOR **Delphi Safety and Interior Systems**

On 9/18/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Delphi Safety and Interior Systems**, located at **200 Georgesville Road, Columbus**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-01324:

3 Industrial Boilers and 2 coating booths.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 122 South Front St, P.O. Box 1049, Columbus, OH 43216-1049 [(614)728-3778]

Permit To Install **Issue Date: To be entered upon final issuance**
Terms and Conditions **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-01324

Application Number: 01-01324
Facility ID: 0125040057
Permit Fee: **To be entered upon final issuance**
Name of Facility: Delphi Safety and Interior Systems
Person to Contact: Cliff Nunn
Address: 200 Georgesville Road
Columbus, OH 43228

Location of proposed air contaminant source(s) [emissions unit(s)]:
200 Georgesville Road
Columbus, Ohio

Description of proposed emissions unit(s):
3 Industrial Boilers and 2 coating booths.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. 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 appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. 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 appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then 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.

2. 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 appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06**.**

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

3. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

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:

i. 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.

ii. 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.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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:

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

ii. 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.

10. Permit-To-Operate Application

a. If 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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.

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

3. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing 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 modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Single HAP (HCl)	9.50 tons per rolling, 12-months
Total HAPs	12.31 tons per rolling, 12-months

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1.

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters MACT, 40 CFR Part 63, Subpart DDDD was promulgated September 13, 2004. The facility is defined as existing source with a compliance date of September 13, 2007. This PTI will be issued as a synthetic minor containing federally enforceable requirements emissions to ensure the HAP emissions for the facility are maintained below MACT thresholds allowing the facility to avoid the MACT requirements.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (B001) - 70 mm Btu/hr coal-fired boiler with side stream separator (baghouse) and multi-cyclone. (modification of an existing emissions unit to establish HCl limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (Synthetic Minor to avoid MACT)	9.50 tons hydrogen chloride (HCl) per rolling, 12-month period from emissions units B001, B002 and B003, combined (see A.I.2.a)
OAC rule 3745-17-10(C)(1)	0.16 pound particulate emissions (PE)/mmBtu of actual heat input
OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
OAC rule 3745-18-28(G)	1.5 pounds sulfur dioxide/mmBtu of actual heat input

2. Additional Terms and Conditions

2.a The emissions of hazardous air pollutants (HAP) from the emission units B001-B003, shall not exceed 9.5 tons for a single HAP and 12.31 tons for the total combined HAPs, based on a rolling, 12-month summation. The emission limitations are for the purpose of establishing federally enforceable limitations to avoid "Maximum Achievable Control Technology" (MACT) applicability.

2.b Pursuant to OAC rule 3745-17-10, the total heat input for B001 through B003 is derated from 268.38 mm Btu/hr to 210 mmBtu/hr. (The derated total heat input of 210 mmBtu/hr corresponds to a steam load of 180,000 lbs/hr.) Using the derated total heat input, the allowable particulate emissions rate for B001, from Figure I of OAC rule 3745-17-10, is 0.16 lb/mm Btu actual heat input.

II. Operational Restrictions

1. The pressure drop across the side stream separator (baghouse) shall be maintained within the range of 7 to 25 inches of water while the emissions unit is in operation.

2. At no time shall the steam flow rate from B001 through B003 exceed 60,000 lbs/hr per boiler and a total 180,000 lbs/hr (as an average over any one-hour period).

3. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I. of the terms and conditions of this permit.

4. The maximum rolling, 12-month coal throughput for emissions units B001, B002 and B003 combined is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n} \left[(U_n)(C_n/100)(36/35)\{1- (R_n) \times (K/100)\} \right] \leq 9.50$$

where,

M = the increment of the rolling 12-month period;

n = individual lot of coal* utilized during the period;

U_n = the throughput of coal for each individual lot n, in tons;

C_n = chlorine content in weight % for each individual coal lot n

(36/35) = molecular weight of chloride is 35 lb/lb-mole and hydrochloric acid is 36 lb/lb-mole

R_n = a value of 1 (one) when fuel additive is employed for HCl control for coal throughput U_n, R_n equals a value of 0 (zero) when no fuel additive is employed for coal throughput U_n

K = % control efficiency for fuel additive as determined during the most recent performance test (see A.V.2).

*An individual lot of coal, n, is defined as an amount of coal utilized which is consistent in chlorine content and the application or non-application of fuel additive (i.e. lot 1 = 0.1% chlorine & fuel additive applied, lot 2 = 0.1% chlorine & no fuel additive applied, lot 3 = 0.2% chlorine & fuel additive applied, etc)

The equation above assumes 100% of the chlorine contained in the coal is converted to HCl.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, coal throughput for emissions units B001,B002 and B003 combined is limited by the following:

Month	$\sum_{n} [(U_n)(C_n/100)(36/35)\{1- (R_n) \times (K/100)\}]$ is less than or equal to
1	1.9
1-2	3.8
1-3	5.7
1-4	7.6
1-12	9.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coal throughput restriction shall be based upon a rolling, 12-month summation.

5 When fuel additive is employed to control HCl emissions, the application rate, in pounds of fuel additive per ton of coal processed, shall be maintained at a level of not less than the rate established during the most recent performance test (see A.V.2).

6. The maximum annual coal throughput for emissions units B001 through B003, combined, shall not exceed 12,322 tons rolling, 12-month period.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for ash content, sulfur content, chlorine content, and heat content.

For each month, the permittee shall also calculate the sulfur dioxide emission rate (in pounds/mmBtu) based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during the calendar month.

3. Requirements for the Sampling and Analysis of the Coal Burned:

The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), chlorine content (percent), and

heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, chlorine content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; ASTM method D4208, Standard Test Method for Total Chlorine in Coal by the Oxygen Bomb Combustion/Ion Selective Electrode Method; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Director (the appropriate Ohio EPA District Office or local air agency).

4. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

5. The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

6. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

7. The permittee shall maintain records of the following information each month for this emissions unit:

a. The company identification of each lot of coal (as defined in A.II.3) utilized;

b. Documentation as to whether or not fuel additive was applied for each lot of coal utilized;

c. The chlorine content, in weight percent, for each lot of coal utilized;

d. The quantity, in tons, of each lot of coal utilized;

e. The calculated HCl emissions from each lot of coal, in tons, using the following equation:

$$E_n = \left[(U_n)(C_n/100)(36/35)\{1- (R_n) \times (K/100)\}\right]$$

where,

E_n = HCl emissions from individual coal lots utilized;

All other variables are the same as described in A.II.3;

f. The total HCl emission rate of all coal lots utilized, in tons/month, calculated as follows:

$E_M = E_1 + E_2 + E_3 + ... + E_n$

where:

E_M = Monthly HCl emissions, in tons/month; and
E_n = HCl emissions from each individual lot of coal utilized (A.III.4.e); and

g. The rolling, 12-month HCl emission rate calculated as follows:

$E_T = E_{M1} + E_{M2} + E_{M3} + ... + E_{M12}$

where:

E_T = Annual HCl emissions (tons) as summed from the previous 12 months of monthly HCl emissions; and
E_M = Monthly HCl emissions (tons/month).

7. For each lot of coal that fuel additive is employed, the permittee shall maintain the following records:

a. The amount of fuel additive applied, in pounds;

b. The amount of coal utilized, in tons; and

c. The resulting feed rate of the fuel additive, in pounds/ton of coal utilized.

8. The permittee shall collect and record the following information each month for emissions units B001 - B003 for the purpose of determining the HAP* emissions:

a. the total (after control) individual HAP emissions for each HAP, in tons;

b. the total combined HAPs emissions (all combustion related HAPs emissions from this emissions unit plus HAPs emissions from the other emissions units located at the facility), in tons;

c. the rolling, 12-month summation of individual HAP emissions for each HAP, in tons; and

d. the rolling, 12-month summation of total combined HAPs emissions, in tons.

The total (after control) HAPs emission rates shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

*A listing of the Hazardous Air Pollutants can be found n Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The permittee shall notify the Director (the Central District Office) in writing of any monthly record from Section A.III of the terms and conditions of this permit that shows a deviation of the allowable sulfur dioxide emission limitation (lb/mmBtu). The notification shall include a copy of such record and shall be sent to the Director (the Central District Office) within 45 days after the deviation occurs.

3. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the appropriate Ohio EPA District Office or local air agency) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

4. The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

5. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet and/or dry) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), chlorine content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. The total quantity of coal received in each shipment (tons);

b. The weighted* average ash content (percent) of the coal received during each calendar month;

c. The weighted* average sulfur content (percent) of the coal received during each calendar month;

d. The weighted* average heat content (Btu/pound) of the coal received during each calendar month; and

e. The weighted* average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received each calendar month.

*In proportion to the quantity of coal received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the coal shipments received during the previous calendar quarters.

6. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the maximum allowable cumulative coal throughput specified in Section A.II.4 for emissions units B001, B002 and B003, combined.

7. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all exceedances of the following:

a. which identify all exceedances of the rolling, 12-month coal throughput restriction for emissions units B001, B002 and B003, combined specified in Section A.II.4;

b. all exceedances of the rolling, 12-month emission limitations of 9.5 of HCL for B001, B002 and B003 combined.

8. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all lots of coal utilized when fuel additive was applied and the fuel additive feed rate in pounds of fuel additive per tons of coal utilized was not maintained at or above the level as specified in Section A.II.4.

9. The permittee shall submit annual reports that summarize the rolling, 12-month summation of individual HAP emissions for emissions units B001 - B003, in tons and the rolling, 12-month summation of total combined HAPs emissions for emissions units B001 - B003, in tons. The report shall be submitted by January 31 of each year and shall cover for the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:
9.50 tons HCl per rolling, 12-month period from emissions units B001 through B003, combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section A.III.7.

b. Emission Limitation:
HAP emissions from units B001-B003, shall not exceed 9.5 tons for a single HAP and 12.31 tons for the total combined HAPs, based on a rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section A.III.8.

c. Emission Limitation:
0.16 pound PE/mmBtu of actual heat input

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:
Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:
If required, compliance with the visible emissions limitation shall be determined in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

e. Emission Limitation:
1.5 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Sections A.III.2 and A.III.3.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods specified in OAC rule 3745-18-04(D).

2. The permittee shall conduct, or have conducted, emission testing for emissions unit B001 in accordance with the following requirements:

a. The emission testing shall be conducted on emissions units B001 prior to employing a control efficiency for the use of fuel additive for the purposes of calculating HCl emissions (see A.III.7).

b. The emission testing shall be conducted to determine the emission rate of HCl in pounds per hour. The emission rate of HCl shall be used to calculate the control efficiency (see A.V.2.g).

c. The following test method(s) from 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and Method 26, as applicable. 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 its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or 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 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).

f. 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.

g. 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.

The written report shall include:

i. The amount of fuel additive applied, in pounds, during each run of the emission test;

ii. The amount of coal utilized, in tons, during each run of the emission test;

iii. The potential/theoretical uncontrolled HCl emissions, in pounds/hour, for each run of the emission test calculated using the mass balance approach in Section A.III.7.e that assumes 100% of the chlorine contained in the coal is converted to HCl;

iv. The actual HCl emission rate during each run of the emission test from emissions unit B001; and

v. The HCl control efficiency of the fuel additive calculated for each run of the emission test [(A.V.2.g.iii - A.V.2.g.iv)/A.V.2.g.iii] x 100

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (B001) - 70 mm Btu/hr coal-fired boiler with side stream separator (baghouse) and multi-cyclone. (modification of an existing emissions unit to establish HCl limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (B002) - 70 mm Btu/hr coal-fired boiler with side stream separator (baghouse) and multi-cyclone. (modification of an existing emissions unit to establish HCl limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (Synthetic Minor to avoid MACT)	9.50 tons hydrogen chloride (HCl) per rolling, 12-month period from emissions units B001, B002 and B003, combined (see A.I.2.a)
OAC rule 3745-17-10(C)(1)	0.16 pound particulate emissions (PE)/mmBtu of actual heat input
OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
OAC rule 3745-18-28(E)	1.5 pounds sulfur dioxide/mmBtu of actual heat input

2. Additional Terms and Conditions

2.a The emissions of hazardous air pollutants (HAP) from the emission units B001-B003, shall not exceed 9.5 tons for a single HAP and 12.31 tons for the total combined HAPs, based on a rolling, 12-month summation. The emission limitations are for the purpose of establishing federally enforceable limitations to avoid "Maximum Achievable Control Technology" (MACT) applicability.

2.b Pursuant to OAC rule 3745-17-10, the total heat input for B001 through B003 is derated from 268.38 mm Btu/hr to 210 mmBtu/hr. (The derated total heat input of 210 mmBtu/hr corresponds to a steam load of 180,000 lbs/hr.) Using the derated total heat input, the allowable particulate emissions rate for B001, from Figure I of OAC rule 3745-17-10, is 0.16 lb/mm Btu actual heat input.

II. Operational Restrictions

1. The pressure drop across the side stream separator (baghouse) shall be maintained within the range of 7 to25 inches of water while the emissions unit is in operation.

2. At no time shall the steam flow rate from B001 through B003 exceed 60,000 lbs/hr per boiler and a total 180,000 lbs/hr (as an average over any one-hour period).

3. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I. of the terms and conditions of this permit.

4. The maximum rolling, 12-month coal throughput for emissions units B001, B002 and B003 combined is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n} \left[(U_n)(C_n/100)(36/35)\{1- (R_n) \times (K/100)\} \right] \leq 9.50$$

where,

M = the increment of the rolling 12-month period;

n = individual lot of coal* utilized during the period;

U_n = the throughput of coal for each individual lot n, in tons;

C_n = chlorine content in weight % for each individual coal lot n

(36/35) = molecular weight of chloride is 35 lb/lb-mole and hydrochloric acid is 36 lb/lb-mole

R_n = a value of 1 (one) when fuel additive is employed for HCl control for coal throughput U_n, R_n equals a value of 0 (zero) when no fuel additive is employed for coal throughput U_n

K = % control efficiency for fuel additive as determined during the most recent performance test (see A.V.2).

*An individual lot of coal, n, is defined as an amount of coal utilized which is consistent in chlorine content and the application or non-application of fuel additive (i.e. lot 1 = 0.1% chlorine & fuel additive applied, lot 2 = 0.1% chlorine & no fuel additive applied, lot 3 = 0.2% chlorine & fuel additive applied, etc)

The equation above assumes 100% of the chlorine contained in the coal is converted to HCl.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, coal throughput for emissions units B001,B002 and B003 combined is limited by the following:

Month	$\sum_{n} [(U_n)(C_n/100)(36/35)\{1- (R_n) \times (K/100)\}]$ is less than or equal to
1	1.9
1-2	3.8
1-3	5.7
1-4	7.6
1-12	9.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coal throughput restriction shall be based upon a rolling, 12-month summation.

5 When fuel additive is employed to control HCl emissions, the application rate, in pounds of fuel additive per ton of coal processed, shall be maintained at a level of not less than the rate established during the most recent performance test (see A.V.2).

6. The maximum annual coal throughput for emissions units B001 through B003, combined, shall not exceed 12,322 tons rolling, 12-month period.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for ash content, sulfur content, chlorine content, and heat content.

For each month, the permittee shall also calculate the sulfur dioxide emission rate (in pounds/mmBtu) based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during the calendar month.

3. Requirements for the Sampling and Analysis of the Coal Burned:

The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), chlorine content (percent), and

heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, chlorine content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; ASTM method D4208, Standard Test Method for Total Chlorine in Coal by the Oxygen Bomb Combustion/Ion Selective Electrode Method; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Director (the appropriate Ohio EPA District Office or local air agency).

4. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

5. The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

6. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

7. The permittee shall maintain records of the following information each month for this emissions unit:

a. The company identification of each lot of coal (as defined in A.II.3) utilized;

b. Documentation as to whether or not fuel additive was applied for each lot of coal utilized;

c. The chlorine content, in weight percent, for each lot of coal utilized;

d. The quantity, in tons, of each lot of coal utilized;

e. The calculated HCl emissions from each lot of coal, in tons, using the following equation:

$$E_n = \left[(U_n)(C_n/100)(36/35)\{1- (R_n) \times (K/100)\}\right]$$

where,

E_n = HCl emissions from individual coal lots utilized;

All other variables are the same as described in A.II.3;

f. The total HCl emission rate of all coal lots utilized, in tons/month, calculated as follows:

$E_M = E_1 + E_2 + E_3 + ... + E_n$

where:

E_M = Monthly HCl emissions, in tons/month; and
E_n = HCl emissions from each individual lot of coal utilized (A.III.4.e); and

g. The rolling, 12-month HCl emission rate calculated as follows:

$E_T = E_{M1} + E_{M2} + E_{M3} + ... + E_{M12}$

where:

E_T = Annual HCl emissions (tons) as summed from the previous 12 months of monthly HCl emissions; and
E_M = Monthly HCl emissions (tons/month).

7. For each lot of coal that fuel additive is employed, the permittee shall maintain the following records:

a. The amount of fuel additive applied, in pounds;

b. The amount of coal utilized, in tons; and

c. The resulting feed rate of the fuel additive, in pounds/ton of coal utilized.

8. The permittee shall collect and record the following information each month for emissions units B001 - B003 for the purpose of determining the HAP* emissions:

a. the total (after control) individual HAP emissions for each HAP, in tons;

b. the total combined HAPs emissions (all combustion related HAPs emissions from this emissions unit plus HAPs emissions from the other emissions units located at the facility), in tons;

c. the rolling, 12-month summation of individual HAP emissions for each HAP, in tons; and

d. the rolling, 12-month summation of total combined HAPs emissions, in tons.

The total (after control) HAPs emission rates shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

*A listing of the Hazardous Air Pollutants can be found n Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The permittee shall notify the Director (the Central District Office) in writing of any monthly record from Section A.III of the terms and conditions of this permit that shows a deviation of the allowable sulfur dioxide emission limitation (lb/mmBtu). The notification shall include a copy of such record and shall be sent to the Director (the Central District Office) within 45 days after the deviation occurs.

3. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the appropriate Ohio EPA District Office or local air agency) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

4. The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

5. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet and/or dry) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), chlorine content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. The total quantity of coal received in each shipment (tons);

b. The weighted* average ash content (percent) of the coal received during each calendar month;

c. The weighted* average sulfur content (percent) of the coal received during each calendar month;

d. The weighted* average heat content (Btu/pound) of the coal received during each calendar month; and

e. The weighted* average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received each calendar month.

*In proportion to the quantity of coal received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the coal shipments received during the previous calendar quarters.

6. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the maximum allowable cumulative coal throughput specified in Section A.II.4 for emissions units B001, B002 and B003, combined.

7. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all exceedances of the following:

a. which identify all exceedances of the rolling, 12-month coal throughput restriction for emissions units B001, B002 and B003, combined specified in Section A.II.4;

b. all exceedances of the rolling, 12-month emission limitations of 9.5 of HCL for B001, B002 and B003 combined.

8. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all lots of coal utilized when fuel additive was applied and the fuel additive feed rate in pounds of fuel additive per tons of coal utilized was not maintained at or above the level as specified in Section A.II.4.

9. The permittee shall submit annual reports that summarize the rolling, 12-month summation of individual HAP emissions for emissions units B001 - B003, in tons and the rolling, 12-month summation of total combined HAPs emissions for emissions units B001 - B003, in tons. The report shall be submitted by January 31 of each year and shall cover for the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:
9.50 tons HCl per rolling, 12-month period from emissions units B001 through B003, combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section A.III.7.

b. Emission Limitation:
HAP emissions from units B001-B003, K021 and K052 shall not exceed 9.5 tons for a single HAP and 12.31 tons for the total combined HAPs, based on a rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section A.III.8.

c. Emission Limitation:
0.16 pound PE/mmBtu of actual heat input

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:
Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:
If required, compliance with the visible emissions limitation shall be determined in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

e. Emission Limitation:
1.5 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Sections A.III.2 and A.III.3.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods specified in OAC rule 3745-18-04(D).

2. The permittee shall conduct, or have conducted, emission testing for emissions unit B002 in accordance with the following requirements:

a. The emission testing shall be conducted on emissions units B002 prior to employing a control efficiency for the use of fuel additive for the purposes of calculating HCl emissions (see A.III.7).

b. The emission testing shall be conducted to determine the emission rate of HCl in pounds per hour. The emission rate of HCl shall be used to calculate the control efficiency (see A.V.2.g).

c. The following test method(s) from 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and Method 26, as applicable. 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 its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or 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 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).

f. 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.

g. 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.

The written report shall include:

i. The amount of fuel additive applied, in pounds, during each run of the emission test;

ii. The amount of coal utilized, in tons, during each run of the emission test;

iii. The potential/theoretical uncontrolled HCl emissions, in pounds/hour, for each run of the emission test calculated using the mass balance approach in Section A.III.7.e that assumes 100% of the chlorine contained in the coal is converted to HCl;

iv. The actual HCl emission rate during each run of the emission test from emissions unit B002; and

v. The HCl control efficiency of the fuel additive calculated for each run of the emission test [(A.V.2.g.iii - A.V.2.g.iv)/A.V.2.g.iii] x 100

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (B002) - 70 mm Btu/hr coal-fired boiler with side stream separator (baghouse) and multi-cyclone. (modification of an existing emissions unit to establish HCl limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (B003) - 70 mm Btu/hr coal-fired boiler with side stream separator (baghouse) and multi-cyclone. (modification of an existing emissions unit to establish HCl limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05 (Synthetic Minor to avoid MACT)	9.50 tons hydrogen chloride (HCl) per rolling, 12-month period from emissions units B001, B002 and B003, combined (see A.I.2.a)
OAC rule 3745-17-10(C)(1)	0.16 pound particulate emissions (PE)/mmBtu of actual heat input
OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
OAC rule 3745-18-28(G)	1.5 pounds sulfur dioxide/mmBtu of actual heat input

2. Additional Terms and Conditions

2.a The emissions of hazardous air pollutants (HAP) from the emission units B001-B003, shall not exceed 9.5 tons for a single HAP and 12.31 tons for the total combined HAPs, based on a rolling, 12-month summation. The emission limitations are for the purpose of establishing federally enforceable limitations to avoid "Maximum Achievable Control Technology" (MACT) applicability.

2.b Pursuant to OAC rule 3745-17-10, the total heat input for B001 through B003 is derated from 268.38 mm Btu/hr to 210 mmBtu/hr. (The derated total heat input of 210 mmBtu/hr corresponds to a steam load of 180,000 lbs/hr.) Using the derated total heat input, the allowable particulate emissions rate for B001, from Figure I of OAC rule 3745-17-10, is 0.16 lb/mm Btu actual heat input.

II. Operational Restrictions

1. The pressure drop across the side stream separator (baghouse) shall be maintained within the range of 7 to 25 inches of water while the emissions unit is in operation.

2. At no time shall the steam flow rate from B001 through B003 exceed 60,000 lbs/hr per boiler and a total 180,000 lbs/hr (as an average over any one-hour period).

3. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I. of the terms and conditions of this permit.

4. The maximum rolling, 12-month coal throughput for emissions units B001, B002 and B003 combined is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n} \left[(U_n)(C_n/100)(36/35)\{1- (R_n) \times (K/100)\} \right] \leq 9.50$$

where,

M = the increment of the rolling 12-month period;

n = individual lot of coal* utilized during the period;

U_n = the throughput of coal for each individual lot n, in tons;

C_n = chlorine content in weight % for each individual coal lot n

(36/35) = molecular weight of chloride is 35 lb/lb-mole and hydrochloric acid is 36 lb/lb-mole

R_n = a value of 1 (one) when fuel additive is employed for HCl control for coal throughput U_n, R_n equals a value of 0 (zero) when no fuel additive is employed for coal throughput U_n

K = % control efficiency for fuel additive as determined during the most recent performance test (see A.V.2).

*An individual lot of coal, n, is defined as an amount of coal utilized which is consistent in chlorine content and the application or non-application of fuel additive (i.e. lot 1 = 0.1% chlorine & fuel additive applied, lot 2 = 0.1% chlorine & no fuel additive applied, lot 3 = 0.2% chlorine & fuel additive applied, etc)

The equation above assumes 100% of the chlorine contained in the coal is converted to HCl.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, coal throughput for emissions units B001,B002 and B003 combined is limited by the following:

Month	$\sum_{n}[(U_n)(C_n/100)(36/35)\{1-(R_n) \times (K/100)\}]$ is less than or equal to
1	1.9
1-2	3.8
1-3	5.7
1-4	7.6
1-12	9.5

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coal throughput restriction shall be based upon a rolling, 12-month summation.

5 When fuel additive is employed to control HCl emissions, the application rate, in pounds of fuel additive per ton of coal processed, shall be maintained at a level of not less than the rate established during the most recent performance test (see A.V.2).

6. The maximum annual coal throughput for emissions units B001 through B003, combined, shall not exceed 12,322 tons rolling, 12-month period.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for ash content, sulfur content, chlorine content, and heat content.

For each month, the permittee shall also calculate the sulfur dioxide emission rate (in pounds/mmBtu) based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during the calendar month.

3. Requirements for the Sampling and Analysis of the Coal Burned:

The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), chlorine content (percent), and

heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, chlorine content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; ASTM method D4208, Standard Test Method for Total Chlorine in Coal by the Oxygen Bomb Combustion/Ion Selective Electrode Method; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Director (the appropriate Ohio EPA District Office or local air agency).

4. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

5. The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

6. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

7. The permittee shall maintain records of the following information each month for this emissions unit:

a. The company identification of each lot of coal (as defined in A.II.3) utilized;

b. Documentation as to whether or not fuel additive was applied for each lot of coal utilized;

c. The chlorine content, in weight percent, for each lot of coal utilized;

d. The quantity, in tons, of each lot of coal utilized;

e. The calculated HCl emissions from each lot of coal, in tons, using the following equation:

$$E_n = \left[(U_n)(C_n/100)(36/35)\{1- (R_n) \times (K/100)\}\right]$$

where,

E_n = HCl emissions from individual coal lots utilized;

All other variables are the same as described in A.II.3;

f. The total HCl emission rate of all coal lots utilized, in tons/month, calculated as follows:

$E_M = E_1 + E_2 + E_3 + ... + E_n$

where:

E_M = Monthly HCl emissions, in tons/month; and
E_n = HCl emissions from each individual lot of coal utilized (A.III.4.e); and

g. The rolling, 12-month HCl emission rate calculated as follows:

$E_T = E_{M1} + E_{M2} + E_{M3} + ... + E_{M12}$

where:

E_T = Annual HCl emissions (tons) as summed from the previous 12 months of monthly HCl emissions; and
E_M = Monthly HCl emissions (tons/month).

7. For each lot of coal that fuel additive is employed, the permittee shall maintain the following records:

a. The amount of fuel additive applied, in pounds;

b. The amount of coal utilized, in tons; and

c. The resulting feed rate of the fuel additive, in pounds/ton of coal utilized.

8. The permittee shall collect and record the following information each month for emissions units B001 - B003 for the purpose of determining the HAP* emissions:

a. the total (after control) individual HAP emissions for each HAP, in tons;

b. the total combined HAPs emissions (all combustion related HAPs emissions from this emissions unit plus HAPs emissions from the other emissions units located at the facility), in tons;

c. the rolling, 12-month summation of individual HAP emissions for each HAP, in tons; and

d. the rolling, 12-month summation of total combined HAPs emissions, in tons.

The total (after control) HAPs emission rates shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

*A listing of the Hazardous Air Pollutants can be found n Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The permittee shall notify the Director (the Central District Office) in writing of any monthly record from Section A.III of the terms and conditions of this permit that shows a deviation of the allowable sulfur dioxide emission limitation (lb/mmBtu). The notification shall include a copy of such record and shall be sent to the Director (the Central District Office) within 45 days after the deviation occurs.

3. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the appropriate Ohio EPA District Office or local air agency) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

4. The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

5. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet and/or dry) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), chlorine content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. The total quantity of coal received in each shipment (tons);

b. The weighted* average ash content (percent) of the coal received during each calendar month;

c. The weighted* average sulfur content (percent) of the coal received during each calendar month;

d. The weighted* average heat content (Btu/pound) of the coal received during each calendar month; and

e. The weighted* average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received each calendar month.

*In proportion to the quantity of coal received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the coal shipments received during the previous calendar quarters.

6. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the maximum allowable cumulative coal throughput specified in Section A.II.4 for emissions units B001, B002 and B003, combined.

7. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all exceedances of the following:

a. which identify all exceedances of the rolling, 12-month coal throughput restriction for emissions units B001, B002 and B003, combined specified in Section A.II.4;

b. all exceedances of the rolling, 12-month emission limitations of 9.5 of HCL for B001, B002 and B003 combined.

8. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all lots of coal utilized when fuel additive was applied and the fuel additive feed rate in pounds of fuel additive per tons of coal utilized was not maintained at or above the level as specified in Section A.II.4.

9. The permittee shall submit annual reports that summarize the rolling, 12-month summation of individual HAP emissions for emissions units B001 - B003, in tons and the rolling, 12-month summation of total combined HAPs emissions for emissions units B001 - B003, in tons. The report shall be submitted by January 31 of each year and shall cover for the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:
9.50 tons HCl per rolling, 12-month period from emissions units B001 through B003, combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section A.III.7.

b. Emission Limitation:
HAP emissions from units B001-B003 shall not exceed 9.5 tons for a single HAP and 12.31 tons for the total combined HAPs, based on a rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section A.III.8.

c. Emission Limitation:
0.16 pound PE/mmBtu of actual heat input

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:
Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:
If required, compliance with the visible emissions limitation shall be determined in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

e. Emission Limitation:
1.5 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Sections A.III.2 and A.III.3.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods specified in OAC rule 3745-18-04(D).

2. The permittee shall conduct, or have conducted, emission testing for emissions unit B003 in accordance with the following requirements:

a. The emission testing shall be conducted on emissions units B003 prior to employing a control efficiency for the use of fuel additive for the purposes of calculating HCl emissions (see A.III.7).

b. The emission testing shall be conducted to determine the emission rate of HCl in pounds per hour. The emission rate of HCl shall be used to calculate the control efficiency (see A.V.2.g).

c. The following test method(s) from 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and Method 26, as applicable. 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 its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or 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 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).

f. 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.

g. 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.

The written report shall include:

i. The amount of fuel additive applied, in pounds, during each run of the emission test;

ii. The amount of coal utilized, in tons, during each run of the emission test;

iii. The potential/theoretical uncontrolled HCl emissions, in pounds/hour, for each run of the emission test calculated using the mass balance approach in Section A.III.7.e that assumes 100% of the chlorine contained in the coal is converted to HCl;

iv. The actual HCl emission rate during each run of the emission test from emissions unit B003; and

v. The HCl control efficiency of the fuel additive calculated for each run of the emission test [(A.V.2.g.iii - A.V.2.g.iv)/A.V.2.g.iii] x 100

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (B003) - 70 mm Btu/hr coal-fired boiler with side stream separator (baghouse) and multi-cyclone. (modification of an existing emissions unit to establish HCl limitation)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None