Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

INTER-OFFICE COMMUNICATION

TO: **DAPC Managers; EER Contacts**

FROM: **Todd Brown, CEMS/COMS Coordinator** TB

SUBJECT: **1st Quarter, 2015, EER Summary Report**

DATE: **July, 2015**

Attached is the first quarter 2015 excess emission report ("EER") data summary report. Data used to compile this report were taken from all EER data received as of the morning of July 6, 2015. Second quarter 2015 EER data will be expected to be entered no later than **August 15, 2015**, and data entered after this date will show as late in the next quarterly EER summary report. The database should be open for second quarter 2015 data entry no later than August 1, 2015.

Notes from a review of first quarter's data entry include:

- Do not enter decimal data. I have asked I.T. to revise the program to disallow decimal data entry, but as of this date they have not had a chance to work on it. Please remember to round input data up or down, accordingly, as data are entered.

- When the "SAVE" button is pushed within the data entry program, the excess emission and downtime percentage data that will be provided to USEPA is calculated, and these values will be displayed on the data entry form. Please confirm these values are what you expect prior leaving that record, and re-enter data if necessary. Several of you have been surprised when your facilities have shown up in the EER Action Data Report when they shouldn't have.

- When an emissions unit has multiple limits in the same unit of measure (SO2 @ 0% O2, for instance), with different averaging periods (a higher limit with 7-day rolling average, and lower limit with a 365-day rolling average), it is highly unlikely that if there is an exceedance of the 7-day limit that there would also be an exceedance of the 365-day limit that lasted the same amount of time. This said, many emissions units that have these multiple limits are having data reported that contains the same amount of excess emissions for both averaging periods/limits.

Many of you have noted that now there is read-only access to the EER data that have been entered after the database has been locked. I am working on revising the way it is presented to make it easier to read, but one step at a time…

Review the data included in this summary for facilities within your jurisdiction, and take appropriate actions for excess emissions and downtime. Corrections or adjustments to the data included should be sent via hard copy, or email, to my attention. Please call me at (614) 644-4839, or email me at <<todd.brown@epa.ohio.gov>> if you have any questions or comments.

Agencies	Facilities	Sources	Monitors	Unique Combinations	Late	Missing	On Time
CDO	11	40	24	54	0	0	54
NEDO	17	25	58	69	7	0	62
NWDO	30	42	106	132	1	0	131
TOLEDO	7	48	60	114	0	0	114
SEDO	19	44	116	173	2	0	171
PORTS	5	16	45	46	23	0	23
RAPCA	5	10	16	18	0	0	18
CLEVELAND	9	19	21	28	0	0	28
HCDES	17	33	89	92	0	0	92
CANTON	3	17	18	30	0	0	30
AKRON	3	17	5	22	0	0	22
SWDO	1	2	1	2	0	0	2
Totals	127	313	559	780	33	0	747

PERCENT OF MONITORED EMISSIONS UNITS EXPERIENCING NON-EXEMPT EXCESS EMISSIONS

COUNT		PERCENT
9	1.0 TO 1.9 PERCENT NON-EXEMPT EXCESS EMISSIONS >>>>>>>	1.61
4	2.0 TO 2.9 PERCENT NON-EXEMPT EXCESS EMISSIONS >>>>>>>	0.72
2	3.0 TO 3.9 PERCENT NON-EXEMPT EXCESS EMISSIONS >>>>>>>	0.36
0	4.0 TO 4.9 PERCENT NON-EXEMPT EXCESS EMISSIONS >>>>>>>	0.00
24	5.0+ PERCENT AND GREATER NON-EXEMPT EXCESS EMISSIONS>	3.08

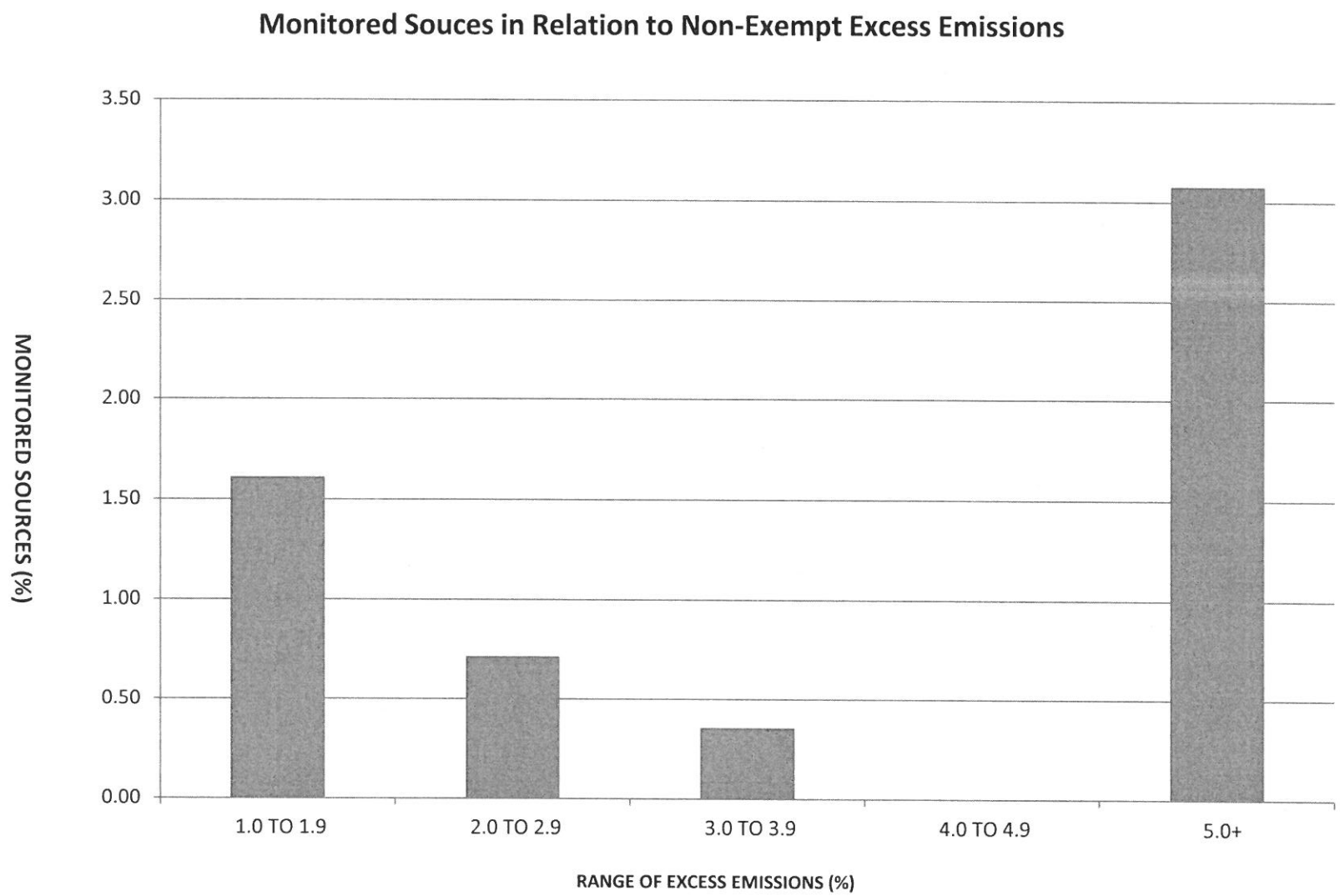
PERCENT OF MONITORED EMISSIONS UNITS EXPERIENCING MONITOR DOWNTIME

COUNT		PERCENT
41	1.0 TO 1.9 PERCENT MONITOR DOWNTIME >>>>>>>>>>>>>>>>>	7.33
21	2.0 TO 2.9 PERCENT MONITOR DOWNTIME >>>>>>>>>>>>>>>>>	3.76
14	3.0 TO 3.9 PERCENT MONITOR DOWNTIME >>>>>>>>>>>>>>>>>	2.50
11	4.0 TO 4.9 PERCENT MONITOR DOWNTIME >>>>>>>>>>>>>>>>>	1.97
44	5.0+ PERCENT AND GREATER MONITOR DOWNTIME >>>>>>>>>>	7.87

> 5% Excess Emissions

PREMISE	FACILITY NAME	SOURCE	MONITOR ID	Source Time w/CEMS	NonExempt EE Minutes	EXCESS EMISSIONS
0302020012	LIMA REFINING COMPANY	P007	H049	129505	25740	19.88%
0302020012	LIMA REFINING COMPANY	P040	S163	109082	15840	14.52%
0302020012	LIMA REFINING COMPANY	P040	S250	109082	17640	16.17%
0302020012	LIMA REFINING COMPANY	P040	S251	109082	13500	12.38%
0302020012	LIMA REFINING COMPANY	P041	S163	106779	15840	14.83%
0302020012	LIMA REFINING COMPANY	P041	S250	106779	17640	16.52%
0302020012	LIMA REFINING COMPANY	P041	S251	106779	13500	12.64%
0448020007	BP -HUSKY REFINING LLC	P007	N493	123000	45780	37.22%
0682000057	ROLLING HILLS GENERATING	P001	C060	2040	480	23.53%
0682000057	ROLLING HILLS GENERATING	P001	N343	2040	540	26.47%
0682000057	ROLLING HILLS GENERATING	P001	N344	2040	180	8.82%
0682000057	ROLLING HILLS GENERATING	P002	C061	3000	660	22.00%
0682000057	ROLLING HILLS GENERATING	P002	N345	2940	780	26.53%
0682000057	ROLLING HILLS GENERATING	P002	N346	2940	180	6.12%
0682000057	ROLLING HILLS GENERATING	P003	C062	2100	660	31.43%
0682000057	ROLLING HILLS GENERATING	P003	N347	2100	720	34.29%
0682000057	ROLLING HILLS GENERATING	P003	N348	2100	180	8.57%
0682000057	ROLLING HILLS GENERATING	P004	C063	720	300	41.67%
0682000057	ROLLING HILLS GENERATING	P004	N349	720	240	33.33%
0682000057	ROLLING HILLS GENERATING	P004	N350	720	60	8.33%
0682000057	ROLLING HILLS GENERATING	P005	C064	3060	1320	43.14%
0682000057	ROLLING HILLS GENERATING	P005	N351	3060	840	27.45%
0682000057	ROLLING HILLS GENERATING	P005	N352	3060	180	5.88%
0701000007	STUART - DAYTON POWER & LIGHT	B002B	P281	506	402	79.45%

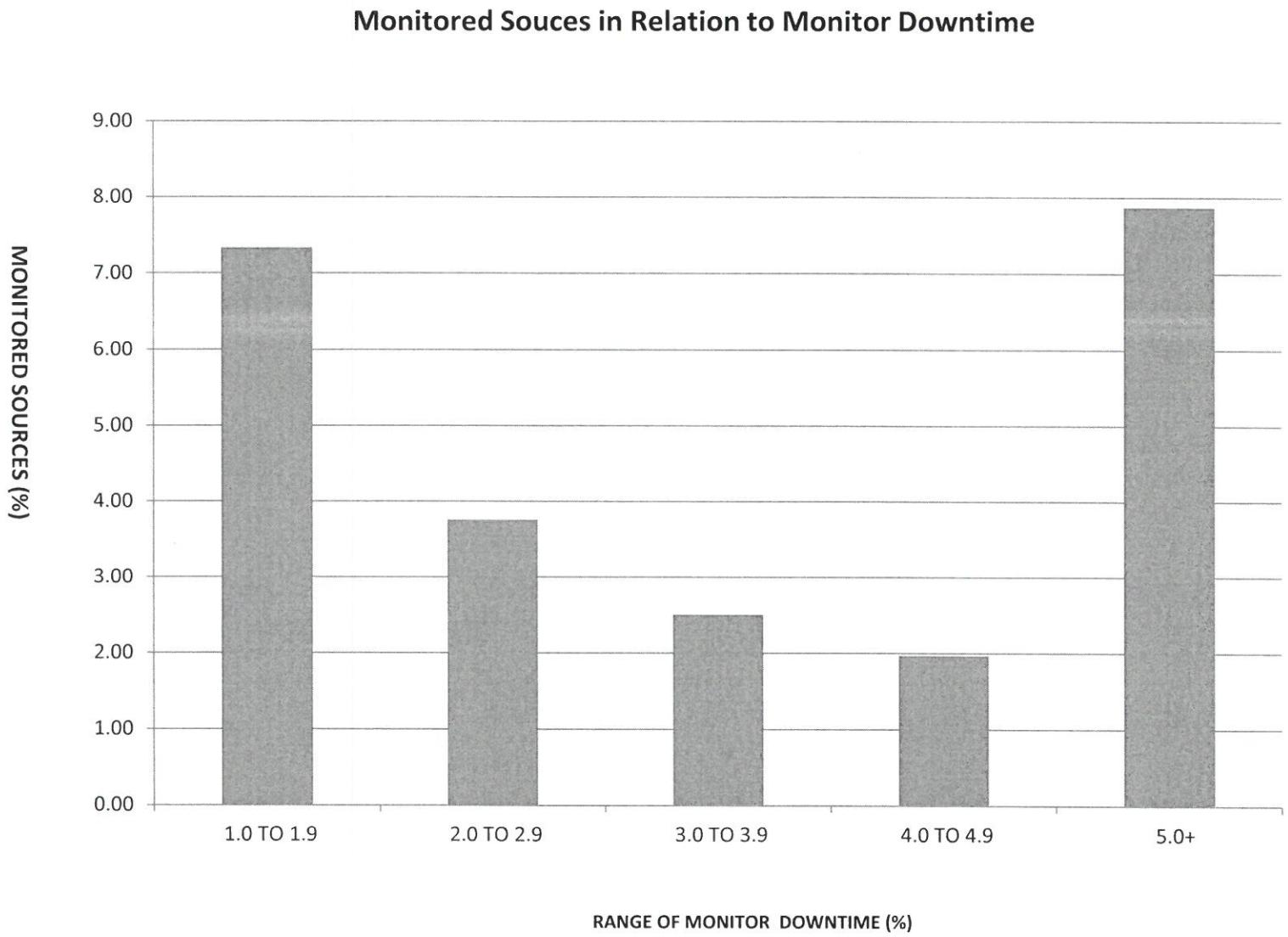
Number of facilities with more than 5% excess emissions 24


Monitored Souces in Relation to Non-Exempt Excess Emissions
MONITORED SOURCES (%)
3.50
3.00
2.50
2.00
1.50
1.00
0.50
0.00
1.0 TO 1.9
2.0 TO 2.9
3.0 TO 3.9
4.0 TO 4.9
5.0+
RANGE OF EXCESS EMISSIONS (%)

>5% Downtime

PREMISE	FACILITY NAME	SOURCE	MONITOR ID	Source Time	Downtime Minutes	% Downtime
0448020007	BP -HUSKY REFINING LLC	P007	C089	129540	6540	5.05%
0448020007	BP -HUSKY REFINING LLC	P007	N428	129540	6540	5.05%
0448020007	BP -HUSKY REFINING LLC	P007	N493	129540	6540	5.05%
0448020007	BP -HUSKY REFINING LLC	P007	S283	129540	6540	5.05%
0448020007	BP -HUSKY REFINING LLC	P007	S318	129540	6540	5.05%
0448020085	LINDE GAS N.A.	P001	N400	129540	20978	16.19%
0616000000	CONESVILLE - AMERICAN ELECTRIC POWER	B004	P129	117222	117222	100.00%
0627000003	KYGER CREEK - Ohio Valley Electric	B001	P135	100944	100944	100.00%
0627000003	KYGER CREEK - Ohio Valley Electric	B002	P135	79758	79758	100.00%
0627000003	KYGER CREEK - Ohio Valley Electric	B003	P135	101646	101646	100.00%
0627000003	KYGER CREEK - Ohio Valley Electric	B004	P135	70632	70632	100.00%
0627000003	KYGER CREEK - Ohio Valley Electric	B005	P135	118764	118764	100.00%
0641050002	CARDINAL PLANT	B009	P072	97776	97776	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B007	P050	120540	120540	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B008	P050	122880	122880	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B009	P052	121740	121740	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B010	P052	101640	101640	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B011	P054	47520	47520	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B012	P054	81840	81840	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B013	P056	99000	99000	100.00%
0701000007	STUART - DAYTON POWER & LIGHT	B001B	P280	505	498	98.61%
0701000007	STUART - DAYTON POWER & LIGHT	B001	P594	89153	89153	100.00%
0701000007	STUART - DAYTON POWER & LIGHT	B001B	S264	505	120	23.76%
0701000007	STUART - DAYTON POWER & LIGHT	B002	D003	90940	8520	9.37%
0701000007	STUART - DAYTON POWER & LIGHT	B002B	P281	569	63	11.07%
0701000007	STUART - DAYTON POWER & LIGHT	B002	P595	90940	90940	100.00%
0701000007	STUART - DAYTON POWER & LIGHT	B002B	S265	569	480	84.36%
0701000007	STUART - DAYTON POWER & LIGHT	B002	S285	90940	8520	9.37%
0701000007	STUART - DAYTON POWER & LIGHT	B003	D004	98747	16560	16.77%
0701000007	STUART - DAYTON POWER & LIGHT	B003B	P282	1790	1790	100.00%
0701000007	STUART - DAYTON POWER & LIGHT	B003	P596	98747	98747	100.00%
0701000007	STUART - DAYTON POWER & LIGHT	B003B	S266	1790	600	33.52%
0701000007	STUART - DAYTON POWER & LIGHT	B003	S286	98747	17460	17.68%
0701000007	STUART - DAYTON POWER & LIGHT	B004B	P283	1624	1624	100.00%
0701000007	STUART - DAYTON POWER & LIGHT	B004	P597	93090	93090	100.00%
0744000150	HANGING ROCK LLC - DUKE	P001	N334	128940	11400	8.84%
0744000150	HANGING ROCK LLC - DUKE	P001	N335	128940	11580	8.98%
0773000080	HAVERHILL CHEMICALS	B010	C121	51771	2991	5.78%
0819750245	ANDERSONS ETHANOL	B001	N444	129600	8100	6.25%
0819750245	ANDERSONS ETHANOL	B001	N445	129600	8100	6.25%
0819750245	ANDERSONS ETHANOL	B002	N444	129600	8100	6.25%
0819750245	ANDERSONS ETHANOL	B002	N445	129600	8100	6.25%
1431074278	EMERY OLEOCHEMICALS (FKA: COGNIS OLEOCHEM	B042	N437	128460	11000	8.56%
1431074278	EMERY OLEOCHEMICALS (FKA: COGNIS OLEOCHEM	B043	N438	128640	10980	8.54%

Number of facilities with more than 5% downtime **44**


Monitored Souces in Relation to Monitor Downtime
MONITORED SOURCES (%)
9.00
8.00
7.00
6.00
5.00
4.00
3.00
2.00
1.00
0.00
1.0 TO 1.9
2.0 TO 2.9
3.0 TO 3.9
4.0 TO 4.9
5.0+
RANGE OF MONITOR DOWNTIME (%)

First Quarter, 2015
EER Action Data Report

This table provides excess emissions report ("EER") data from the third quarter of 2014 through the first quarter of 2015. First quarter 2015 EER data included in the table were received as of the morning of July 6, 2015. Recent EER data from reporting facilities are provided for local and district office review, followed by an appropriate local or district office action. Data are included in this table for sources that were in operation at least 5% of the available time in the specified quarter. **Local and district office staff reviewing this data should take source operation time, CEMS/COMS downtime, excess emissions, and the ability of a facility to correct problems from quarter to quarter into account when determining what, if any, action should be taken.**

EER Data Indicating Issues In The Latest Quarter

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2015	4th Quarter 2014	3rd Quarter 2014
0302020012	Lima Refining Company	P007	H2S (ppm)	19.88 % EE		
		P040	SO2 (lb/K lb S produced)	14.52 % EE		
		P040	SO2 (ppm @0% O2)	16.17 % EE		
		P040	SO2 (lb/hr)	12.38% EE		
		P041	SO2 (lb/K lb S produced)	14.83 % EE		
		P041	SO2 (ppm @0% O2)	16.52% EE		
		P041	SO2 (lb/hr)	12.64 % EE		
0448020007	BP-Husky – Toledo Refinery	B036	NOx (lb/hr)			100 % DT
		P007	NOx (ppm@0% O2, 365 day)	37.22 % EE		
		P007	CO (ppm)	5.05 % DT		
		P007	NOx (ppm@0% O2, 7-Day)	5.05 % DT		
		P007	NOx (ppm@0% O2, 365 day)	5.05 % DT		
		P007	SO2 (ppm@0% O2 7-Day)	5.05 % DT		
		P007	SO2 (ppm@0% O2, 365 day)	5.05 % DT		
		P007 Bypass	CO (ppm)			14.88 % DT
		P007 Bypass	NOx (ppm @0% O2, 7-day)			14.88 % DT

EER Data Indicating Issues In The Latest Quarter

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2015	4th Quarter 2014	3rd Quarter 2014
0448020007	BP-Husky – Toledo Refinery (cont.)	P007 Bypass	NOx (ppm @0% O2, 365-day)			14.88 % DT
		P007 Bypass	Opacity			14.88 % DT
		P007 Bypass	SO2 (ppm @0% O2, 7-day)			14.88 % DT
		P007 Bypass	SO2 (ppm @0% O2, 365-day)			14.88 % DT
		P009	SO2 (ppm @0% O2)		6.76 % DT	
0448020085	Linde Gas N.A.	P001	NOx (lb/hr @3% O2)	16.19 % DT		41.12 % EE
		P002	NOx (lb/hr @ 3% O2)			44.42 % EE
0616000000	Conesville - AEP	B004	Opacity	100 % DT	100 % DT	100 % DT
0627000003	Kyger Creek - OVEC	B001	Opacity	100 % DT	100 % DT	100 % DT
		B002	Opacity	100 % DT	100 % DT	100 % DT
		B003	Opacity	100 % DT	100 % DT	100 % DT
		B004	Opacity	100 % DT	100 % DT	100 % DT
		B005	Opacity	100 % DT	100 % DT	100 % DT
0641050002	Cardinal Plant	B009	Opacity	100 % DT	100 % DT	100 % DT
0641160017	Sammis Station - FirstEnergy	B007	Opacity	100 % DT	100 % DT	100 % DT
		B008	Opacity	100 % DT	100 % DT	100 % DT
		B009	Opacity	100 % DT	100 % DT	100 % DT
		B010	Opacity	100 % DT	100 % DT	100 % DT
		B011	Opacity	100 % DT	100 % DT	100 % DT
		B012	Opacity	100 % DT	100 % DT	100 % DT
		B013	Opacity	100 % DT	100 % DT	100 % DT
0701000007	Stuart Station – Dayton Power & Light	B001 (wet stack)	Opacity	100 % DT	100 % DT	100 % DT
		B001 (wet Stack)	Particulate (lb/mmBtu)			5.78 % DT
		B001 (wet Stack)	SO2 (lb/mmBtu)			6.03 % DT

EER Data Indicating Issues In The Latest Quarter

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2015	4th Quarter 2014	3rd Quarter 2014
0701000007	Stuart Station – Dayton Power & Light (cont.)	B002 (wet stack)	Opacity	100 % DT	100 % DT	100 % DT
		B002 (wet stack)	Particulate (lb/mmBtu)	9.37 % DT		
		B002 (wet stack)	SO2 (lb/mmBtu)	9.37 % DT		
		B003 (wet stack)	Opacity	100 % DT	100 % DT	100 % DT
		B003 (wet stack)	Particulate (lb/mmBtu)	16.77 % DT		
		B003 (wet stack)	SO2 (lb/mmBtu)	17.68 % DT		
		B004 (wet stack)	Opacity	100 % DT		100 % DT
0744000150	Hanging Rock LLC - Duke	P001	NOx (ppm @15% O2)	8.84 % DT	18.70 % DT	
		P001	NOx (lb/hr)	8.98 % DT	18.70 % DT	
0773000080	Haverhill Chemicals	B010	CO (ppm@7% O2)	5.78 % DT		
0819750245	Anderson's Ethanol	B001	NOx (lb/mmBtu)	6.25 % DT		
		B001	NOx (lb/hr)	6.25 % DT		
		B002	NOx (lb/mmBtu)	6.25 % DT		
		B002	NOx (lb/hr)	6.25 % DT		
1431074278	Emery Oleochemicals	B042	NOx (lb/mmBtu)	8.56 % DT		5.44 % DT
		B042	Opacity			5.44 % DT
		B043	NOx (lb/mmBtu)	8.54 % DT		
		B044	NOx (lb/mmBtu)			5.76 % DT

Previous Issues						
Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2015	4th Quarter 2014	3rd Quarter 2014
0243000024	Lubrizol Corporation	P051	SO2 (lb/hr)			5.44 % DT
		P052	SO2 (lb/hr)			5.44 % DT
0243030257	Carmeuse Lime, Inc. – Grand River	P001	Opacity			5.62 % DT
		P002	Opacity			5.62 % DT
0243160009	FirstEnergy - Eastlake	B002	SO2 (lb/mmBtu)			10.74 % DT
0285010188	Orrville Municipal Utilities	B006	Opacity		5.53 % DT	
0448010035	Sunoco, Toledo Terminal Loading Rack	J001	TOC (% of Total)			25.19 % DT
0448010246	Toledo Refining Company	B046	NOx (ppm@0% O2, 7 day)		8.18 % EE	
		B046	NOx (ppm@0% O2, 365 day)		8.18 % EE	
		B047	NOx (ppm@0% O2, 7 day)		8.18 % EE	
		B047	NOx (ppm@0% O2, 365 day)		8.18 % EE	
		P011	NOx (ppm@0% O2, 7 day)		8.18 % EE	
		P011	NOx (ppm@0% O2, 365 day)		8.18 % EE	
0575010160	Cargill Inc., Sidney	B001	SO2 (lb/mmBtu)			5.94 % EE 8.78 % DT
		B002	SO2 (lb/mmBtu)			5.94 % EE 8.78 % DT
0679000251	Belden Brick Co.	P201	SO2 (lb/hr)			56.97 % DT
0701000060	Killen Station – Dayton Power & Light	B001	Opacity			5.98 % DT
0773000182	Haverhill Coke Company	P902	SO2 (lb/hr)			8.24 % DT
		P902	Hg (lb/hr)			9.06 % DT
0829700165	CEMEX	P003	Opacity			5.85 % DT

Previous Issues						
Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2015	4th Quarter 2014	3rd Quarter 2014
1318004311	Cleveland Clinic	B009	NOx (lb/hr)			7.02% DT
		B009	NOx (lb/mmBtu)			7.02% DT
1318270383	DiGeronimo Aggregates, LLC	P901	Opacity		6.50 % EE	
1409011031	Suncoke Energy, Middletown	P901	Hg (lb/hr)		5.03 % DT	
		P901	SO2 (lb/hr)		5.25% DT	
1677010757	Akron thermal, L.P.	B001	Opacity		11.45 % DT	

EE = CEMS recorded excess emissions during monitored emissions unit operation *DT =CEMS downtime while emissions unit in operation (not including QA/QC)*