Statement of Basis For Title V Permit

Part I - General	
Company Name	Dominion Transmission - Carroll Station
Premise Number	02 10 00 0101
What makes this facility a Title V facility?	Carbon Monoxide
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	This permit is no longer bifurcated. The language has been updated. **B001 & B002** are identical turbines. They are permitted in PTI 02-1505. The requirements of 40 CFR 60, Subpart GG are spelled out in more detail and are updated as Subpart GG has been revised. B001 & B002 are exempt from the requirements of OAC rule 3745-18-06(F) via OAC rule 3745-18-06(A). B004 not subject to the requirements of OAC rule 3745-18-06 as natural gas is the only fuel combusted. Current SIP limit of 0.25 lb PE/MMBtu actual heat input was added to renewal permit. Terms & Conditions of B003 not included in the renewal permit as the natural gas-fired boiler is rated 3.5 MMBtu/hr and so is trivial, per Engineering Guide 62.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
1	78-02	N	Fugitive VOC emissions not currently subject to any applicable emissions limitations/control measures, but shall be included in the annual fee emission report.

C **Instructions for Part II:**
Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001, B002	20 % opacity	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - combust only natural gas (inherently clean), M, R & Rt for this OR ET - Method 9, if requested
B001, B002	0.40 lb PE/mm Btu	17-11 (B)(4)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - combust only natural gas; M, R & Rt for this OR
B001, B002	Exempt	18-06 (F)	N	Y	Y	Y	N	N	Y	N	Y	N	N	N	OR - basis of exemption from rule requirements, burn only natural gas, M, R, Rt for this OR
B001, B002	1.6 lbs PE/hour & 7.0 TPY	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - combust only natural gas, ET based upon calcs, emission factors for burn natural gas, M, R & Rt for OR

B001, B002	0.03 lb SO2 & 0.13 TPY	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - combust only natural gas, ET based upon calcs, emission factors for burn natural gas. M, R & Rt for OR
B001, B002	1.49 lbs VOC/hour & 6.5 TPY	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - combust only natural gas, ET based upon calcs, emission factors for burn natural gas. M, R & Rt for OR
B001, B002	7.15 lbs Nox/hour & 31.1 TPY	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - combust only natural gas, M, R & Rt for OR
B001, B002	12.44 lbs CO/hour & 54.5 TPY	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - combust only natural gas, M, R & Rt for OR
B001, B002	42 ppmv Nox	31-05 (A)(3)	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - burn only natural gas, employ low Nox burners, advanced combustion controls
B001, B002	See Comments	N	40 CFR 60, Subpart GG	Y	Y	Y	N	N	Y	N	Y	N	N	N	OR from Subpart GG- not combust any fuel with > 0.8% (by weight) total sulfur Revised Subpart GG allows for a tariff sheet to demonstrate compliance. If no tariff sheet, the approved custom sampling schedule shall be followed. 31-05(A)(3) limit of 42 ppmv Nox is more restrictive than calculated 40 CFR 60, subpart GG limit of 150 ppmv.
B004	3.43 lb NOx/hour	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - combust only natural gas ET - compliance based upon calculations using AP-42 emission factors
B004	2.22 lbs CO/hour	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - combust only natural gas ET - compliance based upon calculations using AP-42 emission factors
B004	0.25 lb PE /MM BTU	17-11 (B)(5)(a)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - combust only natural gas ET - compliance based upon calculations using AP-42 emission factors
B004	0.310 lb PE /MM BTU	17-11 (B)(5)(a)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - combust only natural gas ET - compliance based upon calculations using AP-42 emission factors

B004	20% VE	17-07 (A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - combust only natural gas ET - compliance based upon calculations using AP-42 emission factors
B004	See Comments	18-06 (F)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	EU is exempt from the requirements of OAC rule 3745-18-06 (G) if only natural gas is combusted. OR - combust only natural gas

EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

- **Instructions for Part III:**

  - All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

  - If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not <u>all</u> of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

  When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an

emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.