

Statement of Basis For Title V Permit

Part I - General

Company Name	DP&L, J.M. Stuart Generating Station
Premise Number	0701000007
What makes this facility a Title V facility?	Emission levels for particulates, sulfur dioxide, nitrogen oxides, carbon monoxide, volatile organic compounds and hydrochloric acid.
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)	<p>Emissions unit B001 - revision to monitoring approach to ensure ongoing compliance with the applicable particulate emission limitation based upon on appeal settlement.</p> <p>Emissions units B001-B009 - revisions to sulfur dioxide rule citation for all units based upon change in SIP- revision of sulfur dioxide emission limitations (more stringent) for emissions units B005-B009 based upon change in SIP.</p> <p>Emissions units B001-B009 - revision of ASTM citations - removed erroneous sulfur dioxide method (B005-B009) and specified different method for heat content determination (B001-B004) based upon withdrawal of ASTM methods.</p> <p>Emissions units B005-B009 - minor revisions to sulfur dioxide monitoring (removed volume-weighting provision for oil) and testing requirements (emission limitations and "if required" testing provisions).</p> <p>NOx budget trading program terms have been added to the State and Federally Enforceable facility terms section (Part II).</p>
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

<p>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)</p>	<p>N/A</p>
<p>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)</p>	<p>N/A</p>

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	25-03		emission control action program
A.2	77-03		insignificant emissions units with applicable requirements
A.3	14		NOx budget trading terms

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	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001	20% opacity as a 6-minute average	17-07(A)		N	N	Y	N	N	Y	N	Y	N	Y	N	The continuous opacity monitoring system will be used to ensure ongoing compliance with visible particulate emission limitation. Method 9 observations will be performed as necessary based upon the continuous opacity monitoring system data.
B002 through B004	20% opacity as a 6-minute average	17-07(A)		N	N	Y	N	N	Y	N	Y	N	Y	N	The continuous opacity monitoring system will be used to ensure ongoing compliance with particulate emission limitation. Method 9 observations will be performed as necessary based upon the continuous opacity monitoring system data.

B001	0.10 lb/mmBtu	17-10(C)(1)		N	N	Y	N	Y	Y	N	Y	N	Y	N	A CAM-based monitoring approach will be used to ensure ongoing compliance with the particulate emission limitation. The number of ESP fields out-of-service (in series and total) will be monitored and recorded. Investigations will be triggered if a specified number of ESP fields (either in series and/or total) are out-of-service. Corrective actions and emission testing (or emissions unit shutdown) will be required if the number of ESP fields out-of-service (either in series and/or total) exceeds the number of fields that the U.S. EPA-approved ESP site-specific modeling predicted will result in noncompliance with the particulate emission limitation. This emissions unit failed particulate emission tests while demonstrating complying visible particulate emissions which lead to the development of the aforementioned CAM-based monitoring approach in lieu of using the emissions unit's continuous opacity monitoring system.
B002 through B004	0.10 lb/mmBtu	17-10(C)(1)	N	N	Y	N	N	Y	N	Y	N	N	Y	N	The continuous opacity monitoring system will be used to ensure ongoing compliance with particulate emission limitation. Previous particulate emission tests conducted with all ESP fields in operation have show visible particulate emissions in compliance with the limitations specified in OAC rule 3745-17-07(A). Therefore, if the continuous opacity monitoring system data indicates opacity values in excess of the limitation, we would presume a potential compliance problem with the particulate emission limitation and would take appropriate actions as necessary.
B001 through B004	3.16 lbs/mmBtu	18-07(B)(2)	N	N	Y	N	N	Y	N	Y	N	N	Y	Y	Compliance based upon continuous sulfur dioxide monitoring data or fuel analyses, sulfur dioxide emission tests will be performed if necessary. QA/QC for sulfur dioxide monitoring system in misc. section.
B005 through B009	20% opacity as a 6-minute average	17-07(A)	N	N	Y	N	N	Y	N	Y	N	N	Y	N	These are inherently clean emissions units based upon our knowledge and experience in regulating these types of emissions units. The emissions units shall only be fired with number 2 fuel oil. These emissions units include a back-up boiler and infrequently fired back-up generators.
B005	0.020 lb/mmBtu	17-10(B)(1)	N	N	Y	N	N	Y	N	Y	N	N	Y	N	AP-42 calculation, particulate emission tests will be performed if necessary. The use of number 2 fuel in this inherently clean emissions unit should ensure ongoing compliance with the particulate emission limitation.

B006 through B009	0.35 lb/mmBtu 0.062 lb/mmBtu	17-11(B)(5)(b)	N	N	Y	N	N	Y	N	Y	N	N	Y	N	AP-42 calculation, particulate emission tests will be performed if necessary. The use of number 2 fuel in this inherently clean emissions unit should ensure ongoing compliance with the particulate emission limitation.
B005 through B009	0.5 lb/mmBtu	18-07(B)(1)	N	Y	Y	N	N	Y	N	Y	N	N	Y	N	Purchase fuel with a sulfur content sufficient to comply with the emission limitation.
F001 through F003	None														This facility is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07 and 3745-17-08 do not apply to these fugitive emissions units.

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

C Instructions for Part III:

- C 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.
- C 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 all 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.