

Statement of Basis For Title V Permit

Part I - General

Company Name	DP&L, Tait Generating Station (Tait II)
Premise Number	0857042072
What makes this facility a Title V facility?	CO and NOx
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)	PTI 08-04380 for B001, B002, and B003 added synthetic minor limitation on formaldehyde emissions.
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)	PTI 08-04380 for B001, B002 and B003 to increase the allowable percent sulfur content of the number two fuel oil from 0.02% to 0.05%. PTI 08-04380 for B003 to establish CO emission limits for startup and shutdown.
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)	Not Applicable
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)	Not Applicable

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1. NOx Budget Trading Program	14	N	

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 - B003	0.0006 lb/MMBtu SO2 (natural gas)	31- 05(A)(3)	PTI 08- 0438 0	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is assumed due to low sulfur content in natural gas. If required, sulfur analysis of natural gas.
B001 - B003	0.055 lb/MMBtu SO2 (No. 2 Fuel Oil)	31- 05(A)(3)	PTI 08- 0438 0	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on sulfur analysis of fuel and records. If required, demonstrate compliance through emissions test.

B001 - B003	30.86 TPY SO2	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on monitoring/record keeping.
B001 - B003	10 lbs/hr VOC	31-05(A)(3)	PTI 08-04380	N	N	N	N	N	N	N	N	N	N	N	M: Compliance is based on emission factor based on initial performance test. Monitoring is not necessary. CAM does not apply. R: Compliance is based on emission factor based on initial performance test. Record keeping is not necessary. Rp: Compliance is based on emission factor based on initial performance test. Reporting is not necessary. ET: Compliance is based on emission factor based on initial performance test. If required, demonstrate compliance through emissions test.
B001 - B003	15 TPY VOC	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on emission factor based on initial performance test and monitoring/record keeping.
B001 - B003	8 lbs/hr Particulate/ PM10 (natural gas)	31-05(A)(3)	PTI 08-04380	N	N	N	N	N	N	N	N	N	N	N	M: Compliance is based on AP-42 emission factor. Monitoring is not necessary. CAM does not apply. R: Compliance is based on AP-42 emission factor. Record keeping is not necessary. Rp: Compliance is based on AP-42 emission factor. Reporting is not necessary. ET: Compliance is based on AP-42 emission factor. If required, demonstrate compliance through emissions test.
B001 - B003	0.0072 lb/MMBtu Particulate/ PM10 (natural gas)	31-05(A)(3)	PTI 08-04380	N	N	N	N	N	N	N	N	N	N	N	M: Compliance is based on AP-42 emission factor. Monitoring is not necessary. CAM does not apply. R: Compliance is based on AP-42 emission factor. Record keeping is not necessary. Rp: Compliance is based on AP-42 emission factor. Reporting is not necessary. ET: Compliance is based on AP-42 emission factor. If required, demonstrate compliance through emissions test.

B001 - B003	15 lbs/hr Particulate/ PM10 (No. 2 Fuel Oil)	31-05(A)(3)	PTI 08-04380	N	N	N	N	N	N	N	N	N	N	N	N	M: Compliance is based on AP-42 emission factor. Monitoring is not necessary. CAM does not apply. R: Compliance is based on AP-42 emission factor. Record keeping is not necessary. Rp: Compliance is based on AP-42 emission factor. Reporting is not necessary. ET: Compliance is based on AP-42 emission factor. If required, demonstrate compliance through emissions test.
B001 - B003	0.013 lb/MMBtu Particulate/ PM10 (No. 2 Fuel Oil)	31-05(A)(3)	PTI 08-04380	N	N	N	N	N	N	N	N	N	N	N	N	M: Compliance is based on AP-42 emission factor. Monitoring is not necessary. CAM does not apply. R: Compliance is based on AP-42 emission factor. Record keeping is not necessary. Rp: Compliance is based on AP-42 emission factor. Reporting is not necessary. ET: Compliance is based on AP-42 emission factor. If required, demonstrate compliance through emissions test.
B001 - B003	15.5 TPY Particulate/ PM10	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	N	M: CAM does not apply. ET: Compliance is based on AP-42 emission factor and monitoring/record keeping.
B001 - B002	113 lbs/hr NOx (natural gas)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B001 - B002	25 ppmvd NOx (natural gas)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B003	62 lbs/hr NOx (natural gas)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B003	15 ppmvd NOx (natural gas)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B001 - B003	195 lbs/hr NOx (No. 2 Fuel Oil)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.

B001 - B003	42 ppmvd NOx (No. 2 Fuel Oil)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B001 - B003	132 TPY NOx	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on monitoring/record keeping.
B001 - B002	2000 lbs/hr CO	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B001 - B002	1700 lbs/hr CO (natural gas)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B001 - B002	350 lbs/hr CO (No. 2 Fuel Oil)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B003	301 lbs/hr CO (natural gas, excluding start-up)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B003	413 lbs/hr CO (natural gas, start-up)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B003	800 lbs/hr CO (No. 2 Fuel Oil)	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on CEM. If required, demonstrate compliance through emissions test.
B001 - B003	160.8 TPY CO	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on monitoring/record keeping.

B001 - B003	160.8 TPY CO combined for B001-B003	31-05(A)(3)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on monitoring/record keeping.
B001 - B003	4.2 TPY formaldehyde combined for B001-B003	31-05(C)	PTI 08-04380	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliance is based on AP-42 emission factor and monitoring/record keeping.
B001 - B003	0.05% sulfur content in No. 2 Fuel Oil	31-05(A)(3)	PTI 08-04380	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Appropriate monitoring, record keeping, and reporting requirements are specified. CAM does not apply. ET: Emissions testing is not relevant to this operational restriction.
B001 - B003	Start-up and shutdown not to exceed 30 minutes	31-05(A)(3)	PTI 08-04380	N	Y	N	N	N	Y	N	Y	N	N	N	OR: Appropriate monitoring, record keeping, and reporting requirements are specified. CAM does not apply. M: Record keeping is sufficient. CAM does not apply. ET: Emissions testing is not relevant to this operational restriction.

B001 - B003	Shall not burn fuel oil from April 1 through September 30 of each year, except for one-half hour of each month or under emergency conditions when natural gas supplies are not available	31-05(A)(3)	PTI 08-04380	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Appropriate monitoring, record keeping, and reporting requirements are specified. CAM does not apply. ET: Emissions testing is not relevant to this operational restriction.
B001 - B003	No. 2 Fuel Oil usage shall not exceed 8,580,000 gallons, per rolling, 12-month period	31-05(A)(3)	PTI 08-04380	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Appropriate monitoring, record keeping, and reporting requirements are specified. CAM does not apply. ET: Emissions testing is not relevant to this operational restriction.
B001 - B003	Natural gas usage shall not exceed 2,580,000,000 cubic feet, per rolling, 12-month period	31-05(A)(3)	PTI 08-04380	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Appropriate monitoring, record keeping, and reporting requirements are specified. CAM does not apply. ET: Emissions testing is not relevant to this operational restriction.

B001 - B003	Combust an additional 150 cubic feet of natural gas for each gallon of No. 2 Fuel Oil which is not combusted. Natural gas consumption shall not exceed 3,870,000,000 cubic feet, per rolling, 12-month period.	31-05(A)(3)	PTI 08-04380	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Appropriate monitoring, record keeping, and reporting requirements are specified. CAM does not apply. ET: Emissions testing is not relevant to this operational restriction.
B001 - B003	Burn only pipeline quality natural gas or No. 2 Fuel Oil	31-05(A)(3)	PTI 08-04380	N	Y	N	N	N	Y	N	Y	N	N	N	OR: Appropriate monitoring, record keeping, and reporting requirements are specified. CAM does not apply. M: Record keeping is sufficient. CAM does not apply. ET: Emissions testing is not relevant to this operational restriction.

*** NOTE: Emissions unit P015, which was included in the previous Title V permit as non-insignificant unit, has been shutdown and withdrawn from this permit.**

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.