

# Statement of Basis For Title V Permit

Company Name	CG&E, Miami Fort Station	
Premise Number	1431350093	
Number of Non-insignificant Emissions Units	17	
What makes this facility a Title V facility?	Potential emissions of particulates, sulfur dioxide, carbon monoxide, hydrochloric acid, volatile organic compounds and nitrogen oxides.	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
A.1	20	40 CFR Part 61	asbestos renovation and removal activities
A.2	25-03		emission control action program

- **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.

- If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

**Part III (Requirements Within the State & Federally Enforceable Section)**

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	O t h e r							
B005 through B007 and B015	VEs not to exceed 20% opacity as a 6-min. avg. except as provided by rule	17-07(A)		N	Y	Y	Y	Y	N	The continuous opacity monitoring system will be used to ensure ongoing compliance with the visible particulate emission limitations.
B005 through B007 and B015	.10 lb of PE/mmBtu	17-10(C)(1)		N	Y	Y	Y	Y	N	The continuous opacity monitoring system will be used to ensure ongoing compliance with the particulate emission limitation.
B005 and B006	5.0 lbs of SO2/mmBtu	18-37 (BB)(2)		N	Y	Y	Y	Y	N	Compliance with the mass emission limitation is based on the monitoring and record keeping requirements. Emission testing, if required.
B007	5.0 lbs of SO2/mmBtu	18-37 (BB)(3)		N	Y	Y	Y	Y	N	Compliance with the mass emission limitation is based on the monitoring and record keeping requirements. Emission testing, if required.
B015	5.5 lbs of SO2/mmBtu	18-37 (BB)(5)		N	Y	Y	Y	Y	N	Compliance with the mass emission limitation is based on the monitoring and record keeping requirements. Emission testing, if required.
B010 through B014	VEs not to exceed 20% opacity as a 6-min. avg. except as provided by rule	17-07(A)		Y	Y	Y	Y	Y	N	OR - This is an inherently clean emissions unit based upon our knowledge and experience in regulating these types of emissions units. The emissions unit shall only be fired with number two fuel oil. ET- If required, Method 9 shall be employed to demonstrate compliance with this emission limitation.
B010 through B013	.040 lb of PE/mmBtu	17-11(B)(4)		Y	Y	Y	Y	Y	N	OR - This is an inherently clean emissions unit based upon our knowledge and experience in regulating these types of emissions units. The emissions unit shall only be fired with number two fuel oil. ET- AP-42 calculations. If required, Method 5 shall be employed to demonstrate compliance with this emission limitation.
B014	.020 lb of PE/mmBtu	17-10(B)(1)		Y	Y	Y	Y	Y	N	OR - This is an inherently clean emissions unit based upon our knowledge and experience in regulating these types of emissions units. The emissions unit shall only be fired with number two fuel oil. ET- AP-42 calculations. If required, Method 5 shall be employed to demonstrate compliance with this emission limitation.

B010 through B013	0.5 lb of SO <sub>2</sub> /mmBtu	18-37 (BB)(4)		Y	Y	Y	Y	Y	N	OR - The quality of oil must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. These emissions units shall only be fired with number two fuel oil. ET -Compliance based upon fuel analyses, sulfur dioxide emission tests will be performed if necessary.
B014	1.6 lbs of SO <sub>2</sub> /mmBtu	18-06(D)		Y	Y	Y	Y	Y	N	OR - The quality of oil must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. These emissions units shall only be fired with number two fuel oil. ET -Compliance based upon fuel analyses, sulfur dioxide emission tests will be performed if necessary.
B016	VEs not to exceed 20% opacity as a 6-min. avg. except for 6 min. in any 60 min., but not to exceed 27% as a 6-min. avg. at any time		Y	N	Y	Y	Y	Y	N	Other - 40 CFR Part 60.42(a)(2) The continuous opacity monitoring system will be used to ensure ongoing compliance with the visible particulate emission limitations.
B016	VEs not to exceed 20% opacity as a 6-min. avg. except as provided by rule	17-07(A)								The applicable emission limitations from this rule are less stringent than the emission limitations specified in 40 CFR Part 60.42(a)(2)
B016	.10 lb of PE/mmBtu	17-10(C)(1)	Y	N	Y	Y	Y	Y	N	Other - 40 CFR Part 60.42(a)(1) The continuous opacity monitoring system will be used to ensure ongoing compliance with the particulate emission limitation.
B016	1.2 lbs of SO <sub>2</sub> /mmBtu	18-37(BB)(6)	Y	N	Y	Y	Y	Y	N	Other - 40 CFR Part 60.43(a)(2) Compliance with the mass emission limitation is based on the monitoring and record keeping requirements. Emission testing, if required.
B016	0.70 lb of NO <sub>x</sub> /mmBtu		Y	N	Y	Y	Y	Y	N	Other - 40 CFR Part 60.44(a)(3) Compliance with the mass emission limitation is based on the monitoring and record keeping requirements. Emission testing, if required.
B016	0.9 lb of NO <sub>x</sub> /mmBtu	23-06(C)(3)								The applicable emission limitations from this rule are less stringent than the emission limitations specified in 40 CFR Part 60.44(a)(3)

F001, F002, F004 through F006, and P901	VEs not to exceed 20% opacity as a 3-min. avg.	17-07(B)(7)(b)		N	Y	Y	Y	Y	N	
F001 through F006, and P901	reasonably available control measures...	17-08(B)		N	Y	Y	Y	Y	N	
F002	VEs not to exceed 20% opacity as a 3-min. avg.	17-07(B)(7)(c)		N	Y	Y	Y	Y	N	
F002	no VEs except for 13 min. during any 60-min. period	17-07(B)(7)(d)		N	Y	Y	Y	Y	N	
F004	VEs not to exceed 20% opacity as a 3-min. avg.	17-07(B)(1)		N	Y	Y	Y	Y	N	
F003	no VEs except for 6 min. or 13 min. during any 60-min. period	17-07(B)(7)(a)(ii)		N	Y	Y	Y	Y	N	
F005, F006, and P901	VEs not to exceed 20% opacity as a 6-min. avg. except as provided by rule	17-07(A)(1)		N	Y	Y	Y	Y	N	
F005 and F006	46.3 lbs of PE/hr	17-11(B)(1)		N	Y	Y	Y	Y	N	Compliance with the emission limit is based upon the absence of visible emissions. Emission testing will be performed, if required.
P901	25.4 lbs PE/hr	17-11(B)(1)		N	Y	Y	Y	Y	N	Compliance with the emission limit is based upon the absence of visible emissions. Emission testing will be performed, if required.

EU = emissions unit id  
OR = operational restriction  
M = monitoring requirements  
R = recordkeeping 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 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. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

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

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, 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 superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

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