

Statement of Basis For Title V Permit

Company Name	CG&E, Wm. H. Zimmer Station	
Premise Number	1413090154	
Number of Non-insignificant Emissions Units	12	
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	

Part II (State and Federally Enforceable Requirements)			
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							
B001 through B003	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.
B001 through B003	.35 lb of PE/mmBtu	17-11(B)(5)(b)		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. The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/mmBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
B001 through B003	.062 lb of PE/mmBtu	17-11(B)(5)(b)		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. This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.
B001 through B003	1.6 lbs of SO ₂ /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.
B006	1.0 lb of SO ₂ /mmBtu, as a 3-hr avg.		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(D) The continuous sulfur dioxide monitoring system will be used to ensure ongoing compliance with the sulfur dioxide emission limitation.

B006	.025 lb of PE/mmBtu, 1310 tons/yr, and .5% of the potential PE		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3) The continuous opacity monitoring system will be used to ensure ongoing compliance with the particulate emission limitation.
B006	VEs not to exceed 20% opacity as a 6-min. avg. except for 1 6 min. period per hour of not more than 27% opacity		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3) The continuous opacity monitoring system will be used to ensure ongoing compliance with the visible particulate emission limitation.
B006	.548 lb of SO2/mmBtu , 28726 tons/yr, and 9% of the potential SO2 emissions		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3) The continuous sulfur dioxide monitoring system will be used to ensure ongoing compliance with the sulfur dioxide emission limitation.
B006	.60 lb of NOx/mmBtu , 31452 tons/yr, and 35% of the potential NOx emissions		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3) The continuous nitrogen oxides monitoring system will be used to ensure ongoing compliance with the nitrogen oxides emission limitation.
B006	1406 tons of CO/yr		Y	N	Y	Y	Y	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with this emission limitation shall be based upon the coal usage records and AP-42 emission factor.
B006	84 tons of VOC/yr		Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05(A)(3) M, R, Rp, and ET - This emission limitation reflects the potential to emit for this emissions unit based upon an emission factor from EPA-600/7-80-111.
B006		17-07(A) 17-10(C) 18-19(A) 21-08(B) 23-06(C)(3)	Y							Other - 40 CFR Part 60, Subpart Da The emission limitations, control techniques and operating practices required by these rules are equivalent to or less stringent than the emission limitations, control techniques and operating practices established pursuant to OAC rule 3745-31-05.

B007 and B008	VEs not to exceed 20% opacity as a 6-min. avg.		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3) The continuous opacity monitoring system will be used to ensure ongoing compliance with the visible particulate emission limitation.
B007 and B008	.55 lb of SO ₂ /mmBtu and 55.7 tons/yr		Y	Y	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3) OR - The quality of oil must meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation. Sulfur content of the number two fuel oil shall not exceed 0.5%, by weight.
B007 and B008	.10 lb of NO _x /mmBtu and 10.1 tons/yr		Y	Y	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3) OR - Nitrogen content of the number two fuel oil shall not exceed 0.3%, by weight.
B007 and B008	3.8 tons of CO/yr		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with this emission limitation shall be based upon the fuel usage records and AP-42 emission factor.
B007 and B008	0.3 ton of VOC/yr		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with this emission limitation shall be based upon the fuel usage records and AP-42 emission factor.
B007 and B008	2.03 tons of PE/yr		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with this emission limitation shall be based upon the fuel usage records and AP-42 emission factor.
B007 and B008	.020 lb of PE/mmBtu	17-10(B)(1)		N	Y	Y	Y	Y	N	The continuous opacity monitoring system will be used to ensure ongoing compliance with the particulate emission limitation.
B007 and B008		17-07(A) 18-06(D) 21-08(B) 23-06(C)(2)	Y							Other - 40 CFR Part 60, Subpart Db The emission limitations, control techniques and operating practices required by these rules are equivalent to or less stringent than the emission limitations, control techniques and operating practices established pursuant to OAC rule 3745-31-05. In addition, the lb/mmBtu particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3) is less stringent than the particulate emission limitation specified in OAC rule 3745-17-10(B)(1).
F001, F002, Y001, and Y002	VEs not to exceed 5% opacity as a 3-min. avg.		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3)
F001 and Y001	no VEs except for 13 min. during any 60-min. period		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3)

F001	best available control technology and best available technology control measures for fugitive dust emissions		Y	N	Y	Y	Y	Y	N	Other - OAC rules 3745-31-05(A)(3) and 3745-31-05(D)
F002, P901, P902, and P903	best available control technology control measures for fugitive dust emissions		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(D)
P901, P902, and P903	.03 grain of PE/dscf		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3)
P901, P902, P903, and Y002	VEs not to exceed 10% opacity as a 6-min. avg.		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3)
P901, P902, and P903	VEs not to exceed 20% opacity as a 3-min. avg.		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3)
P901		17-07(A) 17-11(B)	Y							Other - 40 CFR Part 60, Subpart Y The emission limitations required by these rules are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05.
P902 and P903		17-07(A) 17-11(B)								The emission limitations required by these rules are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05.

Y001 and Y002	best available technology control measures for fugitive dust emissions		Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05(A)(3)
---------------------	--	--	---	---	---	---	---	---	---	-----------------------------------

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.