

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	City of Hamilton Department of Public Utilities	
Premise Number	1409040243	
Number of Non-insignificant Emissions Units	7	
What makes this facility a Title V facility?	PM, SO2, CO, NOx	
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	
B.1.			Listing of insignificant emission units

- **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-)	Other							
B001	1.40 lbs SO ₂ /MMBtu actual heat input	N	40 CFR Part 52.18 81(b)(12)(i)	Y	Y	Y	Y	N	N	OR. Oil quality requirements. M. Oil analysis. R. Oil analysis records. Rp. Oil analysis reports. ET. If testing is required to demonstrate compliance with the SO ₂ limit, 40 CFR Part 60, Appendix A, USEPA Method 6 shall be used to determine compliance.
	20% Opacity as a six-minute average	17-07(A)	N	N	Y	Y	Y	N	N	M. Daily records when any fuel other than clean fuels are burned. R. Daily records when any fuel other than clean fuels are burned. Rp. Deviation reports when any fuel other than clean fuels are burned. ET. 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3) will be used to determine compliance.
	0.020 lb PM/MMBtu of actual heat input	17-10(B)(1)	N	Y	Y	Y	Y	N	N	OR. Use of inherently clean fuels - natural gas and/or No. 2 fuel oil. M. Daily records when any fuel other than clean fuels are burned. R. Daily records when any fuel other than clean fuels are burned. Rp. Deviation reports when any fuel other than clean fuels are burned. ET. Compliance shall be demonstrated by emission factors from AP-42 external combustion sources (Section 1.3, Table 1.3-1 [Table 1]). If testing is required to demonstrate compliance with the PM limit, Method 5 of 40 CFR Part 60, Appendix A shall be used.
B002	1.40 lbs SO ₂ /MMBtu actual heat input	N	40 CFR Part 52.18 81(b)(12)(i)	Y	Y	Y	Y	N	N	OR. Oil quality requirements. M. Oil analysis. R. Oil analysis records. Rp. Oil analysis reports. ET. If testing is required to demonstrate compliance with the SO ₂ limit, 40 CFR Part 60, Appendix A, USEPA Method 6 shall be used to determine compliance.
	20% Opacity as a six-minute average	17-07(A)	N	N	Y	Y	Y	N	N	M. Daily records when any fuel other than clean fuels are burned. R. Daily records when any fuel other than clean fuels are burned. Rp. Deviation reports when any fuel other than clean fuels are burned. ET. 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3) will be used to determine compliance.
	0.020 lb PM/MMBtu of actual heat input	17-10(B)(1)	N	Y	Y	Y	Y	N	N	OR. Use of inherently clean fuels - natural gas and/or No. 2 fuel oil. M. Daily records when any fuel other than clean fuels are burned. R. Daily records when any fuel other than clean fuels are burned. Rp. Deviation reports when any fuel other than clean fuels are burned. ET. Compliance shall be demonstrated by emission factors from AP-42 external combustion sources (Section 1.3, Table 1.3-1 [Table 1]). If testing is required to demonstrate compliance with the PM limit, Method 5 of 40 CFR Part 60, Appendix A shall be used.

B003	20% Opacity as a six-minute average	17-07(A)	N	N	Y	Y	Y	N	N	M. Daily records when any fuel other than clean fuels are burned. R. Daily records when any fuel other than clean fuels are burned. Rp. Deviation reports when any fuel other than clean fuels are burned. ET. 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3) will be used to determine compliance.
	0.040 lb PM/MMBtu of actual heat input	17-11(B)(4)	N	Y	Y	Y	Y	N	N	OR. Use of inherently clean fuels - natural gas and/or No. 2 fuel oil. M. Daily records when any fuel other than clean fuels are burned. R. Daily records when any fuel other than clean fuels are burned. Rp. Deviation reports when any fuel other than clean fuels are burned. ET. Compliance shall be demonstrated by emission factors from AP-42 external combustion sources (Section 3.1, Table 3.1-1). If testing is required to demonstrate compliance with the PM limit, Method 5 of 40 CFR Part 60, Appendix A shall be used.
	0.5 lb SO2/MMBtu of actual heat input.	18-06(F)	N	Y	Y	Y	Y	N	N	OR. Oil quality requirements. M. Oil analysis. R. Oil analysis records. Rp. Oil analysis reports. ET. If testing is required to demonstrate compliance with the SO2 limit, 40 CFR Part 60, Appendix A, USEPA Method 6 shall be used to determine compliance.
B004	20% Opacity as a six-minute average	17-07(A)	N	N	Y	Y	Y	N	N	M. Daily records when any fuel other than clean fuels are burned. R. Daily records when any fuel other than clean fuels are burned. Rp. Deviation reports when any fuel other than clean fuels are burned. ET. 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3) will be used to determine compliance.
	0.040 lb PM/MMBtu of actual heat input	17-11(B)(4)	N	Y	Y	Y	Y	N	N	OR. Use of inherently clean fuels - natural gas and/or No. 2 fuel oil. M. Daily records when any fuel other than clean fuels are burned. R. Daily records when any fuel other than clean fuels are burned. Rp. Deviation reports when any fuel other than clean fuels are burned. ET. Compliance shall be demonstrated by emission factors from AP-42 external combustion sources (Section 3.1, Table 3.1-1). If testing is required to demonstrate compliance with the PM limit, Method 5 of 40 CFR Part 60, Appendix A shall be used.
	0.5 lb SO2/MMBtu of actual heat input.	18-06(F)	N	Y	Y	Y	Y	N	N	OR. Oil quality requirements. M. Oil analysis. R. Oil analysis records. Rp. Oil analysis reports. ET. If testing is required to demonstrate compliance with the SO2 limit, 40 CFR Part 60, Appendix A, USEPA Method 6 shall be used to determine compliance.

B008	1.40 lbs SO ₂ /MMBtu actual heat input	N	40 CFR Part 52.18 81(b)(12)(i)	Y	Y	Y	Y	N	N	OR. Coal quality requirements. M. Coal analysis. R. Coal analysis records. Rp. Coal analysis reports. ET. 40 CFR Part 60, Appendix A, USEPA Method 6 shall be used to determine compliance with the SO ₂ emission limits.
	20% Opacity as a six-minute average	17-07(A)	N	N	Y	Y	Y	Y	N	M. Continuous opacity monitor. R. Records of data from continuous opacity monitor. Rp. Excess emission reports required. ET. 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3) will be used to determine compliance.
	0.14 lb PM/MMBtu of actual heat input	17-10(C)	N	Y	Y	Y	Y	Y	N	OR. Use of ESP. M. Continuous opacity monitor. R. Records of data from continuous opacity monitor. Rp. Excess emission reports required. ET. 40 CFR Part 60, Appendix A, USEPA Method 5 shall be used to determine compliance with the PM emission limits.
B009	1.2 lbs SO ₂ /MMBtu of actual heat input	N	40 CFR Part 60.43 (a)(2)	Y	Y	Y	Y	N	N	OR. Coal Quality Requirements M. Continuous sulfur dioxide monitor. R. Records of data from continuous sulfur dioxide monitor. Rp. Excess emission reports required. ET. 40 CFR Part 60, Appendix A, USEPA Method 6 shall be used to determine compliance with the sulfur dioxide emission limits.
	0.70 lb NO _x /MMBtu of actual heat input	N	40 CFR Part 60.44 (a)(3)	N	Y	Y	Y	N	N	M. Continuous nitrogen oxide monitor. R. Records of data from continuous nitrogen oxide monitor Rp. Excess emission reports required. ET. 40 CFR Part 60, Appendix A, USEPA Method 7 shall be used to determine compliance with the nitrogen oxide emission limits.
	20% Opacity as a six-minute average	N	40 CFR Part 60.42 (a)(2)	N	Y	Y	Y	Y	N	M. Continuous opacity monitor. R. Records of data from continuous opacity monitor. Rp. Excess emission reports required. ET. 40 CFR Part 60, Appendix A, USEPA Method 9 shall be used to determine compliance with the opacity limits
	0.10 lb PM/MMBtu of actual heat input	17-10(C)	40 CFR Part 60.42 (a)(1)	Y	Y	Y	Y	Y	N	OR. Use of ESP. M. Continuous opacity monitor. R. Records of data from continuous opacity monitor. Rp. Excess emission reports required. ET. 40 CFR Part 60, Appendix A, USEPA Method 5 shall be used to determine compliance with the PM emission limits.
	0.70 lb NO _x /MMBtu of actual heat input	23-06 (B) and 23-06 (C)(3)	N	N	Y	Y	Y	N	N	M. Continuous nitrogen oxide monitor. R. Records of data from continuous nitrogen oxide monitor Rp. Excess emission reports required. ET. 40 CFR Part 60, Appendix A, USEPA Method 7 shall be used to determine compliance with the nitrogen oxide emission limits.

		21-08(B)	N	N	N	N	N	N	N	M. None R. None Rp. None ET. 40 CFR Part 60, Appendix A, USEPA Method 10 shall be used to determine compliance with the nitrogen oxide emission limits.
B010	20% Opacity as a six-minute average	17-07(A)(1)	N	N	Y	Y	Y	N	N	M. Daily records when any fuel other than clean fuels are burned. R. Daily records when any fuel other than clean fuels are burned. Rp. Deviation reports when any fuel other than clean fuels are burned. ET. 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3) will be used to determine compliance.
	0.20 lb PM/MMBtu of actual heat inout	17-10(B)(1)	N	Y	Y	Y	Y	N	N	OR. Use of inherently clean fuels - natural gas and/or No. 2 fuel oil. M. Daily records when any fuel other than clean fuels are burned. R. Daily records when any fuel other than clean fuels are burned. Rp. Deviation reports when any fuel other than clean fuels are burned. ET. Compliance shall be demonstrated by emission factors from AP-42 external combustion sources (Section 1.4, Table 1.4-1). If testing is required to demonstrate compliance with the PM limit, Method 5 of 40 CFR Part 60, Appendix A shall be used
	0.10 lb NOx/MM Btu of actual heat inout	31-05	N	Y	Y	Y	Y	N	N	OR. Fuel usage limitation M. Daily fuel usage records. R. Daily fuel usage records. Rp. Deviation reports for fuel usage limitation. ET. 40 CFR Part 60, Appendix A, USEPA Method 7 shall be used to determine compliance with the nitrogen oxide emission limits, if needed.
	Daily Fuel Usage Records	N	40 CFR Part 60 Subpart Dc	N	N	Y	N	N	N	OR. None M. None R. Daily fuel usage records. Rp. None ET. None.

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.