



State of Ohio Environmental Protection Agency

Street Address:

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P.O. Box 1049
Columbus, OH 43216-1049

01/31/00

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

02-47-03-0013
Cleveland Electric Illuminating, Avon Lake Power Plant
Mr. Michael J. Jirousek
P.O. Box 94661
Room 310
Cleveland, OH 44101-4661

Dear Michael J. Jirousek:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Northeast District Office.

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive style with a large initial "T" and "R".

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Northeast District Office



Ohio EPA

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 01/31/00

Effective Date:

Expiration Date:

The duration of this permit will be five years.

This document constitutes issuance to:

Cleveland Electric Illuminating, Avon Lake Power Plant
33570 Lake Road
Avon Lake, OH 44012-0000

of a Title V permit for Facility ID: 02-47-03-0013

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

B010 (Boiler #10)

Coal-fired boiler for electric generation - 1131 mmBtu/hr

B012 (Boiler #12)

Coal-fired boiler for electric generation - 6040 mmBtu/hr

B013 (Gas Turbine)

Oil-fired combustion turbine for electric generation - 468.9 mmBtu/hr

B015 (Package Boiler #1)

Nebraska Company Package Boiler - 219.5 mmBtu/hr.

B016 (Package Boiler #2)

Nebraska Company Package Boiler - 219.5 mmBtu/hr.

F002 (Coal Pile)

Coal storage pile

P901 (Coal Handling)

Coal unloading and conveying system

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance

with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. (“Act”); and, pursuant to 40 CFR 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be

submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency and to the Administrator of U.S. EPA in the following manner in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

4. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

5. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.
2. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61 and OAC Chapter 3745-20.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

F001 - Roadways and Parking areas;
P902 - Ash Handling Operations;
T001 - Storage Tank #1;
T002 - Storage Tank #2;
T003 - Storage Tank #3;
T005 - Storage Tank #5;
T006 - Storage Tank #6;
T007 - Storage Tank #7;
T008 - Storage Tank #8;
Z001 - Storage Tank #9;
Z002 - Storage Tank #10;
Z003 - Storage Tank #11;
Z004 - Storage Tank #12;
Z005 - Storage Tank #13;
Z006 - Storage Tank #14;
Z007 - Storage Tank #15;
Z008 - Diesel Engine #1;
Z009 - Diesel Engine #2;
Z010 - Diesel Engine #3; and
Z011 - Diesel Engine #4.

Each insignificant emissions unit at this facility must comply with all State and federal regulations, as well as any emission limitation and/or control requirements contained within a Permit to Install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #10 (B010)

Activity Description: Coal-fired boiler for electric generation - 1131 mmBtu/hr

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pulverized coal-fired, dry bottom, boiler having a nominal heat input capacity of 1,131 mmBtu/hr, and controlled with an electrostatic precipitator (ESP).	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)	Particulate emissions shall not exceed 0.10 lb/mmBtu actual heat input.
	40 CFR Part 52.1881(b)(20)(iii)	Sulfur dioxide emissions shall not exceed 4.65 lbs/mmBtu actual heat input.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation in Section A.I. above.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

III. Monitoring and/or Record Keeping Requirements (continued)

2. If the continuous sulfur dioxide monitoring system is used to demonstrate compliance with the sulfur dioxide emission limitation, the permittee shall operate and maintain equipment to continuously monitor and record sulfur dioxide emissions from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain documentation from the USEPA or the Ohio EPA that the continuous sulfur dioxide monitoring system has been certified in accordance with 40 CFR Part 75. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous sulfur dioxide monitoring system: the average daily and rolling, 30-day average emission rates of sulfur dioxide in lb/mmBtu actual heat input, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments. In addition, the permittee shall maintain daily records of the total actual heat input values as determined through F-Factor and carbon dioxide/oxygen calculations as specified in 40 CFR Part 60, Appendix A, Method 19.

3. If coal sampling and analysis is used to demonstrate compliance with the sulfur dioxide emission limitation, the permittee shall maintain daily records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, and heat content in accordance with the following:

The permittee shall collect daily composite samples of the coal burned in this emissions unit. A sufficient number of individual samples shall be collected so that each composite sample is representative of the average quality of coal burned in this emissions unit during each calendar day. The coal sampling shall be performed in accordance with the most recent version of ASTM method D2234, Collection of a Gross Sample of Coal.

Each daily composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be the most recent version of: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the Ohio EPA, Northeast District Office.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. If the continuous sulfur dioxide monitoring system is used to demonstrate compliance with the sulfur dioxide emission limitation, the permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of sulfur dioxide values in excess of the applicable rolling, 30-day average sulfur dioxide emission rate (lb/mmBtu). These reports shall also contain average daily sulfur dioxide emission rates (lb/mmBtu) which are greater than 1.5 times the sulfur dioxide emission limitation specified in Section A.1.

The reports shall also document any continuous sulfur dioxide monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. If coal sampling and analysis is used to demonstrate compliance with the sulfur dioxide emission limitation, the permittee shall submit deviation (excursion) reports that document any average daily sulfur dioxide emission rate which was greater than 1.5 times the sulfur dioxide emission limitation specified in Section A.1 and any 30-day rolling, weighted average sulfur dioxide emission rate greater than the sulfur dioxide emission limitation specified in Section A.1. These reports shall be submitted in accordance with Section A.1.c.ii of the General Terms and Conditions.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 0.10 lb/mmBtu actual heat input in accordance with the following requirements:

The particulate emission testing shall be conducted twice during the term of this permit. Once between years 2 and 3, and once during the last year of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA, Northeast District Office.

2. Compliance with the visible emission limitations in OAC rule 3745-17-07(A) shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
3. Compliance with the sulfur dioxide emission limitation shall be based upon a rolling, 30-day average of the daily sulfur dioxide emission rates, in accordance with the USEPA's policy entitled "Enforcement Policy for Sulfur Dioxide Emission Limitations in Ohio" and dated February 11, 1980 (45 FR 9101). The daily and rolling 30-day sulfur dioxide emission rates shall be determined and reported in accordance with the applicable requirements of paragraphs A.III.2, A.III.3, A.IV.2, and A.IV.3 of this permit. The permittee may be required to perform sulfur dioxide emission tests if warranted by the USEPA's enforcement policy. In such cases, the methods and procedures specified in 40 CFR Part 60.46 shall be employed.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pulverized coal-fired, dry bottom, boiler having a nominal heat input capacity of 1,131 mmBtu/hr, and controlled with an ESP.	OAC rule 3745-18-53(B)(2)	Sulfur dioxide emissions shall not exceed 4.65 lbs/mmBtu actual heat input.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor that measures the temperature of the boiler exhaust gases entering the ESP (a) during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) during all periods of shutdown until the inlet temperature of the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitor shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. A logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. A logbook dedicated to the continuous sulfur dioxide monitoring system must be kept on site and available for inspection during regular office hours.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #12 (B012)

Activity Description: Coal-fired boiler for electric generation - 6040 mmBtu/hr

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pulverized coal-fired, dry bottom, boiler having a nominal heat input capacity of 6,040 mmBtu/hr, and controlled with an electrostatic precipitator (ESP).	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)	Particulate emissions shall not exceed 0.10 lb/mmBtu actual heat input.
	40 CFR Part 52.1881(b)(20)(iii)	Sulfur dioxide emissions shall not exceed 4.65 lbs/mmBtu actual heat input.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation in Section A.I. above.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

III. Monitoring and/or Record Keeping Requirements (continued)

2. If the continuous sulfur dioxide monitoring system is used to demonstrate compliance with the sulfur dioxide emission limitation, the permittee shall operate and maintain equipment to continuously monitor and record sulfur dioxide emissions from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain documentation from the USEPA or the Ohio EPA that the continuous sulfur dioxide monitoring system has been certified in accordance with 40 CFR Part 75. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous sulfur dioxide monitoring system: the average daily and rolling, 30-day average emission rates of sulfur dioxide in lb/mmBtu actual heat input, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments. In addition, the permittee shall maintain daily records of the total actual heat input values as determined through F-Factor and carbon dioxide/oxygen calculations as specified in 40 CFR Part 60, Appendix A, Method 19.

3. If coal sampling and analysis is used to demonstrate compliance with the sulfur dioxide emission limitation, the permittee shall maintain daily records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, and heat content in accordance with the following:

The permittee shall collect daily composite samples of the coal burned in this emissions unit. A sufficient number of individual samples shall be collected so that each composite sample is representative of the average quality of coal burned in this emissions unit during each calendar day. The coal sampling shall be performed in accordance with the most recent version of ASTM method D2234, Collection of a Gross Sample of Coal.

Each daily composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be the most recent version of: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the Ohio EPA, Northeast District Office.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. If the continuous sulfur dioxide monitoring system is used to demonstrate compliance with the sulfur dioxide emission limitation, the permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of sulfur dioxide values in excess of the applicable rolling, 30-day average sulfur dioxide emission rate (lb/mmBtu). These reports shall also contain average daily sulfur dioxide emission rates (lb/mmBtu) which are greater than 1.5 times the sulfur dioxide emission limitation specified in Section A.1.

The reports shall also document any continuous sulfur dioxide monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. If coal sampling and analysis is used to demonstrate compliance with the sulfur dioxide emission limitation, the permittee shall submit deviation (excursion) reports that document any average daily sulfur dioxide emission rate which was greater than 1.5 times the sulfur dioxide emission limitation specified in Section A.1 and any 30-day rolling, weighted average sulfur dioxide emission rate greater than the sulfur dioxide emission limitation specified in Section A.1. These reports shall be submitted in accordance with Section A.1.c.ii of the General Terms and Conditions.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 0.10 lb/mmBtu actual heat input in accordance with the following requirements:

The particulate emission testing shall be conducted twice during the term of this permit. Once between years 2 and 3, and once during the last year of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA, Northeast District Office.

2. Compliance with the visible emission limitations in OAC rule 3745-17-07(A) shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
3. Compliance with the sulfur dioxide emission limitation shall be based upon a rolling, 30-day average of the daily sulfur dioxide emission rates, in accordance with the USEPA's policy entitled "Enforcement Policy for Sulfur Dioxide Emission Limitations in Ohio" and dated February 11, 1980 (45 FR 9101). The daily and rolling 30-day sulfur dioxide emission rates shall be determined and reported in accordance with the applicable requirements of paragraphs A.III.2, A.III.3, A.IV.2, and A.IV.3 of this permit. The permittee may be required to perform sulfur dioxide emission tests if warranted by the USEPA's enforcement policy. In such cases, the methods and procedures specified in 40 CFR Part 60.46 shall be employed.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pulverized coal-fired, dry bottom, boiler having a nominal heat input capacity of 6,040 mmBtu/hr, and controlled with an ESP.	OAC rule 3745-18-53(B)(2)	Sulfur dioxide emissions shall not exceed 4.65 lbs/mmBtu actual heat input.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor that measures the temperature of the boiler exhaust gases entering the ESP (a) during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) during all periods of shutdown until the inlet temperature of the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitor shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- A logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
- A logbook dedicated to the continuous sulfur dioxide monitoring system must be kept on site and available for inspection during regular office hours.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Gas Turbine (B013)

Activity Description: Oil-fired combustion turbine for electric generation - 468.9 mmBtu/hr

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Distillate oil-fired (i.e., numbers 1 and 2, kerosene and diesel fuels, but excluding number 4) combustion turbine for electric generation having a nominal heat input capacity of 468.9 mmBtu/hr.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(4)	Particulate emissions shall not exceed .040 lb/mmBtu actual heat input.
	OAC rule 3745-18-06(F)	Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input.
	OAC rule 3745-21-08(B)	See A.I.2.a below.
	OAC rule 3745-23-06(B)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The design of the emissions unit and the technology associated with the current operating practices will satisfy the requirement to minimize the carbon monoxide and nitrogen oxides emissions from this emissions unit.

II. Operational Restrictions

1. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I above.
2. The permittee shall burn only distillate oil (i.e., numbers 1 and 2, kerosene and diesel fuels, but excluding number 4) in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

- a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. Also, if necessary, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.

- b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu).

The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). Also, if necessary, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the daily samples during a calendar month.

2. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.
3. For each day during which the permittee burns a fuel other than distillate oil (i.e., numbers 1 and 2, kerosene and diesel fuels, but excluding number 4), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northeast District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northeast District Office) within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than distillate oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b** Emission Limitation:
Particulate emissions shall not exceed .040 lb/mmBtu actual heat input.

Applicable Compliance Method-

Compliance shall be based upon an emission factor of 0.038 lb/mmBtu. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-1 (10/96). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

- 1.c** Emission Limitation:
Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input.

Applicable Compliance Method:

Except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received or each daily sample collected during a calendar month meets the limitation.

If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis or if the sulfur content of each daily sample collected during a calendar month does not comply with the allowable emission limitation on an "as-burned" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments or daily samples of oil during the calendar month.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Distillate oil-fired (i.e., numbers 1 and 2, kerosene and diesel fuels, but excluding number 4) combustion turbine for electric generation having a nominal heat input capacity of 468.9 mmBtu/hr.	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Package Boiler #1 (B015)
Activity Description: Nebraska Company Package Boiler - 219.5 mmBtu/hr.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Natural gas and number two fuel oil-fired package boiler for steam generation only, having a nominal heat input capacity of 219.5 mmBtu/hr when firing natural gas and 210.0 mmBtu/hr when firing number two fuel oil.	40 CFR Part 60.43b	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.
	OAC rule 3745-17-10(B)	Particulate emissions shall not exceed .020 lb/mmBtu of actual heat input.
	OAC rule 3745-31-05 PTI 02-10862	Carbon monoxide emissions shall not exceed 0.09 lb/mmBtu actual heat input, 19.76 lbs/hr, and 86.53 tons/yr.
		Particulate emissions shall not exceed 4.39 lbs/hr and 19.23 tons/yr.
		Nitrogen oxides emissions shall not exceed 43.9 lbs/hr and 192.3 tons/yr.
		Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input, 105.0 lbs/hr, and 460.0 tons/yr.
	40 CFR Part 60.44b	See A.I.2.e below. Nitrogen oxides emissions shall not exceed 0.20 lb/mmBtu heat input (expressed as nitrogen dioxide).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	The visible particulate emission limitations specified in this rule are less stringent than the visible particulate emission limitation specified in 40 CFR Part 60, Subpart Db.
	OAC rule 3745-18-53(A)(2) and 40 CFR Part 60.42b(a)	The sulfur dioxide emission limitations specified in these rules are less stringent than the sulfur dioxide emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-08(B)	See A.I.2.a below.
	OAC rule 3745-23-06(B)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established in Permit to Install 02-10862.
- 2.b** The installation of this emissions unit at this facility did not trigger the applicability of 40 CFR Part 52.21 (Prevention of Significant Deterioration) for particulates, nitrogen oxides, sulfur dioxide and carbon monoxide due to the contemporaneous shutdown of another emissions unit at the facility. Prior to the start-up of this emissions unit, the permittee permanently shut down emissions unit B014. Emissions unit B014 was a 1,131 mmBtu/hr coal-fired boiler controlled with an electrostatic precipitator that was located at this facility.
- 2.c** This emissions unit was designed and constructed as a "high heat release rate" unit. As specified in 40 CFR Part 60.41b, "high heat release rate" means a heat release rate greater than 70,000 Btu/hr-cubic ft.
- 2.d** This emissions unit is not subject to the sulfur dioxide compliance and performance testing requirements specified in 40 CFR Part 60.45b and the sulfur dioxide emission monitoring requirements specified in 40 CFR Part 60.47b because the emissions unit is restricted to firing only "very low sulfur oil", as defined in 40 CFR Part 60.41b and Section A.II.1 below.
- 2.e** The height of the stack serving this emissions unit shall be at least 400 feet above ground level.

II. Operational Restrictions

- 1.** The permittee shall only fire natural gas or "very low sulfur oil" in this emissions unit.

As defined in 40 CFR Part 60.41b, "very low sulfur oil" means an oil that contains no more than 0.5 weight percent sulfur or that, when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 0.5 lb/mmBtu heat input.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

2. The permittee shall operate and maintain equipment to continuously monitor and record nitrogen oxides emissions from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous nitrogen oxides monitoring system has been certified in accordance with 40 CFR Part 60. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system: emissions of nitrogen oxides in lb/mmBtu actual heat input on an hourly average basis, lbs/hr on an hourly average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

The permittee shall maintain daily records of the total actual heat input values as determined through F-Factor and carbon dioxide/oxygen calculations as specified in 40 CFR Part 60, Appendix A, Method 19.

3. For each shipment of "very low sulfur oil" received for burning in this emissions unit, the permittee shall maintain records of the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).)

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of "very low sulfur oil" that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Ohio EPA, Northeast District Office.

4. The permittee shall maintain daily records of the following information:
 - a. the amount of natural gas and/or "very low sulfur oil" fired in this emissions unit; and
 - b. a record of the type and quantity of fuel, other than natural gas and/or "very low sulfur oil", that is fired in this emissions unit.
5. The permittee shall maintain monthly records of the calculated annual capacity factors for natural gas and "very low sulfur oil". The annual capacity factors shall be determined on a rolling, 12-month average basis with a new annual capacity factor calculated at the end of each calendar month.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all 3-hour average nitrogen oxides values in excess of the applicable nitrogen oxides emission limitations (lb/mmBtu and lbs/hr).

The reports shall also document any continuous nitrogen oxides monitoring system downtime while the emissions unit was on line (date, time, duration and reason), along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office that:
 - a. certify that only "very low sulfur oil" was fired in this emissions unit during the previous calendar quarter; and
 - b. report the annual capacity factors for natural gas and "very low sulfur oil" over the previous 12 months.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

4. The permittee shall submit annual reports that specify the total particulate, carbon monoxide, nitrogen oxides, and sulfur dioxide emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the visible emission limitations listed in Section A.I.1 shall be determined through visible observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

2. Emission Limitations:
Particulate emissions shall not exceed .020 lb/mmBtu of actual heat input, 4.39 lbs/hr, and 19.23 tons/yr.

Applicable Compliance Method:

When firing number two fuel oil, compliance with these emission limitations shall be based upon an emission factor of 0.012 lb of particulates/mmBtu and the heat input records required pursuant to Section A.III.2. The emission factor is the averaged result of particulate emission testing of this emissions unit conducted on December 10, 1997.

When firing natural gas, compliance shall be determined by multiplying an emission factor of 1.9 lbs of particulates/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (0.2195 mm.cu. ft./hr) and dividing by the emissions unit's total heat input capacity (219.5 mmBtu/hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

If required, the permittee shall demonstrate compliance with the lb/mmBtu and/or lbs/hr emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 while firing number two fuel oil.

3. Emission Limitations:
Carbon monoxide emissions shall not exceed 0.09 lb/mmBtu actual heat input, 19.76 lbs/hr, and 86.53 tons/yr.

Applicable Compliance Method:

When firing number two fuel oil, compliance with these emission limitations shall be based upon an emission factor of 0.021 lb of carbon monoxide/mmBtu and the heat input records required pursuant to Section A.III.2. The emission factor is the averaged result of carbon monoxide emission testing of this emissions unit conducted on December 10, 1997.

When firing natural gas, compliance shall be determined by multiplying an emission factor of 84 lbs of carbon monoxide/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (0.2195 mm.cu. ft./hr) and dividing by the emissions unit's total heat input capacity (219.5 mmBtu/hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (2/98).

If required, the permittee shall demonstrate compliance with the lb/mmBtu and/or lbs/hr emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10 while firing natural gas.

4. Emission Limitations:
Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input, 105.0 lbs/hr, and 460.0 tons/yr.

Applicable Compliance Method:

When firing number two fuel oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received meets the limitation on an "as-received" basis.

When firing natural gas, compliance with this emission limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel. However, compliance can be determined by multiplying an emission factor of 0.6 lb/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (.2195 mm cu. ft./hr) and dividing by the emissions unit's total heat input capacity (219.5 mmBtu/hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

If required, the permittee shall demonstrate compliance with the lb/mmBtu and/or lbs/hr emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 while firing number two fuel oil.

V. Testing Requirements (continued)

5. Emission Limitations:
Nitrogen oxides emissions shall not exceed 0.20 lb/mmBtu heat input (expressed as nitrogen dioxide), 43.9 lbs/hr, and 192.3 tons/yr.

Applicable Compliance Method:

The data from the continuous nitrogen oxides monitoring system shall be used to demonstrate compliance with the lb/mmBtu and lbs/hr emission limitations.

If required, the permittee shall demonstrate compliance with the lb/mmBtu and/or lbs/hr emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 while firing number two fuel oil.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. A logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous nitrogen oxides monitoring system designed to ensure continuous valid and representative readings of nitrogen oxides emissions in units of the applicable standards. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and/or 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous nitrogen oxides monitoring system must be kept on site and available for inspection during regular office hours.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Package Boiler #2 (B016)
Activity Description: Nebraska Company Package Boiler - 219.5 mmBtu/hr.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Natural gas and number two fuel oil-fired package boiler for steam generation only, having a nominal heat input capacity of 219.5 mmBtu/hr when firing natural gas and 210.0 mmBtu/hr when firing number two fuel oil.	40 CFR Part 60.43b	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.
	OAC rule 3745-17-10(B)	Particulate emissions shall not exceed .020 lb/mmBtu of actual heat input.
	OAC rule 3745-31-05 PTI 02-10862	Carbon monoxide emissions shall not exceed 0.09 lb/mmBtu actual heat input, 19.76 lbs/hr, and 86.53 tons/yr.
		Particulate emissions shall not exceed 4.39 lbs/hr and 19.23 tons/yr.
		Nitrogen oxides emissions shall not exceed 43.9 lbs/hr and 192.3 tons/yr.
		Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input, 105.0 lbs/hr, and 460.0 tons/yr.
	40 CFR Part 60.44b	See A.I.2.e below. Nitrogen oxides emissions shall not exceed 0.20 lb/mmBtu heat input (expressed as nitrogen dioxide).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	The visible particulate emission limitations specified in this rule are less stringent than the visible particulate emission limitation specified in 40 CFR Part 60, Subpart Db.
	OAC rule 3745-18-53(A)(2) and 40 CFR Part 60.42b(a)	The sulfur dioxide emission limitations specified in these rules are less stringent than the sulfur dioxide emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-08(B)	See A.I.2.a below.
	OAC rule 3745-23-06(B)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established in Permit to Install 02-10862.
- 2.b** The installation of this emissions unit at this facility did not trigger the applicability of 40 CFR Part 52.21 (Prevention of Significant Deterioration) for particulates, nitrogen oxides, sulfur dioxide and carbon monoxide due to the contemporaneous shutdown of another emissions unit at the facility. Prior to the start-up of this emissions unit, the permittee permanently shut down emissions unit B014. Emissions unit B014 was a 1,131 mmBtu/hr coal-fired boiler controlled with an electrostatic precipitator that was located at this facility.
- 2.c** This emissions unit was designed and constructed as a "high heat release rate" unit. As specified in 40 CFR Part 60.41b, "high heat release rate" means a heat release rate greater than 70,000 Btu/hr-cubic ft.
- 2.d** This emissions unit is not subject to the sulfur dioxide compliance and performance testing requirements specified in 40 CFR Part 60.45b and the sulfur dioxide emission monitoring requirements specified in 40 CFR Part 60.47b because the emissions unit is restricted to firing only "very low sulfur oil", as defined in 40 CFR Part 60.41b and Section A.II.1 below.
- 2.e** The height of the stack serving this emissions unit shall be at least 400 feet above ground level.

II. Operational Restrictions

- 1.** The permittee shall only fire natural gas or "very low sulfur oil" in this emissions unit.

As defined in 40 CFR Part 60.41b, "very low sulfur oil" means an oil that contains no more than 0.5 weight percent sulfur or that, when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 0.5 lb/mmBtu heat input.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

2. The permittee shall operate and maintain equipment to continuously monitor and record nitrogen oxides emissions from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous nitrogen oxides monitoring system has been certified in accordance with 40 CFR Part 60. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system: emissions of nitrogen oxides in lb/mmBtu actual heat input on an hourly average basis, lbs/hr on an hourly average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

The permittee shall maintain daily records of the total actual heat input values as determined through F-Factor and carbon dioxide/oxygen calculations as specified in 40 CFR Part 60, Appendix A, Method 19.

3. For each shipment of "very low sulfur oil" received for burning in this emissions unit, the permittee shall maintain records of the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).)

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of "very low sulfur oil" that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Ohio EPA, Northeast District Office.

4. The permittee shall maintain daily records of the following information:
 - a. the amount of natural gas and/or "very low sulfur oil" fired in this emissions unit; and
 - b. a record of the type and quantity of fuel, other than natural gas and/or "very low sulfur oil", that is fired in this emissions unit.
5. The permittee shall maintain monthly records of the calculated annual capacity factors for natural gas and "very low sulfur oil". The annual capacity factors shall be determined on a rolling, 12-month average basis with a new annual capacity factor calculated at the end of each calendar month.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all 3-hour average nitrogen oxides values in excess of the applicable nitrogen oxides emission limitations (lb/mmBtu and lbs/hr).

The reports shall also document any continuous nitrogen oxides monitoring system downtime while the emissions unit was on line (date, time, duration and reason), along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office that:
 - a. certify that only "very low sulfur oil" was fired in this emissions unit during the previous calendar quarter; and
 - b. report the annual capacity factors for natural gas and "very low sulfur oil" over the previous 12 months.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

4. The permittee shall submit annual reports that specify the total particulate, carbon monoxide, nitrogen oxides, and sulfur dioxide emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the visible emission limitations listed in Section A.I.1 shall be determined through visible observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

2. Emission Limitations:
Particulate emissions shall not exceed .020 lb/mmBtu of actual heat input, 4.39 lbs/hr, and 19.23 tons/yr.

Applicable Compliance Method:

When firing number two fuel oil, compliance with these emission limitations shall be based upon an emission factor of 0.012 lb of particulates/mmBtu and the heat input records required pursuant to Section A.III.2. The emission factor is the averaged result of particulate emission testing of this emissions unit conducted on December 10, 1997.

When firing natural gas, compliance shall be determined by multiplying an emission factor of 1.9 lbs of particulates/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (0.2195 mm.cu. ft./hr) and dividing by the emissions unit's total heat input capacity (219.5 mmBtu/hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

If required, the permittee shall demonstrate compliance with the lb/mmBtu and/or lbs/hr emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 while firing number two fuel oil.

3. Emission Limitations:
Carbon monoxide emissions shall not exceed 0.09 lb/mmBtu actual heat input, 19.76 lbs/hr, and 86.53 tons/yr.

Applicable Compliance Method:

When firing number two fuel oil, compliance with these emission limitations shall be based upon an emission factor of 0.021 lb of carbon monoxide/mmBtu and the heat input records required pursuant to Section A.III.2. The emission factor is the averaged result of carbon monoxide emission testing of this emissions unit conducted on December 10, 1997.

When firing natural gas, compliance shall be determined by multiplying an emission factor of 84 lbs of carbon monoxide/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (0.2195 mm.cu. ft./hr) and dividing by the emissions unit's total heat input capacity (219.5 mmBtu/hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (2/98).

If required, the permittee shall demonstrate compliance with the lb/mmBtu and/or lbs/hr emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10 while firing natural gas.

4. Emission Limitations:
Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input, 105.0 lbs/hr, and 460.0 tons/yr.

Applicable Compliance Method:

When firing number two fuel oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received meets the limitation on an "as-received" basis.

When firing natural gas, compliance with this emission limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel. However, compliance can be determined by multiplying an emission factor of 0.6 lb/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (.2195 mm cu. ft./hr) and dividing by the emissions unit's total heat input capacity (219.5 mmBtu/hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

If required, the permittee shall demonstrate compliance with the lb/mmBtu and/or lbs/hr emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 while firing number two fuel oil.

V. Testing Requirements (continued)

5. Emission Limitations:
Nitrogen oxides emissions shall not exceed 0.20 lb/mmBtu heat input (expressed as nitrogen dioxide), 43.9 lbs/hr, and 192.3 tons/yr.

Applicable Compliance Method:

The data from the continuous nitrogen oxides monitoring system shall be used to demonstrate compliance with the lb/mmBtu and lbs/hr emission limitations.

If required, the permittee shall demonstrate compliance with the lb/mmBtu and/or lbs/hr emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 while firing number two fuel oil.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. A logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous nitrogen oxides monitoring system designed to ensure continuous valid and representative readings of nitrogen oxides emissions in units of the applicable standards. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and/or 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous nitrogen oxides monitoring system must be kept on site and available for inspection during regular office hours.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coal Pile (F002)
Activity Description: Coal storage pile

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
load-in or load-out of the coal storage pile (see Section A.1.2.a for the identification of the coal storage pile)	OAC rule 3745-17-07(B)(7)(b)	visible particulate emissions shall not exceed 20% opacity, as a 3-minute average (see Section A.1.2.h)
	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.1.2.b, A.1.2.c and A.1.2.g)
operation of vehicles on top of the coal storage pile, excluding emissions from the combustion of fuels in such vehicles (i.e., pile working)	OAC rule 3745-17-07(B)(7)(c)	visible particulate emissions shall not exceed 20% opacity, as a 3-minute average (see Section A.1.2.h)
	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.1.2.d, A.1.2.f and A.1.2.g)
wind erosion from coal storage piles	OAC rule 3745-17-07(B)(7)(d)	no visible emissions except for 13 minutes during any 60-minute observation period (see Section A.1.2.h)
	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Section A.1.2.e through A.1.2.g)

2. Additional Terms and Conditions

- 2.a The coal storage pile that is covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 is listed below:

8.0 acre plant coal storage pile

2. Additional Terms and Conditions (continued)

- 2.b** The permittee shall employ reasonably available control measures on all coal load-in and load-out operations associated with the coal storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to use enclosures, telescopic chutes, and precautionary operating practices for the coal load-in operations and to use a reclaimer system and under pile gravity feed for the coal load-out operations to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The above-mentioned control measures shall be employed for each coal load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.
- 2.d** The permittee shall employ reasonably available control measures on all pile working operations associated with the coal storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ precautionary operating practices for the pile working operations to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The permittee shall employ reasonably available control measures for wind erosion from pile surfaces associated with the coal storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the pile working operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.f** The above-mentioned control measures shall be employed for each pile working operation and wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures shall not be necessary for a coal storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.g** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- 2.h** The emission limitation and rule citation reflect the settlement agreement reached between Ohio EPA and the Ohio Electric Utilities concerning the Utilities' appeal to the Ohio Environmental Review Appeals Commission of the 1991 revisions and additions to OAC Chapter 3745-17. The revised rule containing the limitation and rule citation was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the Ohio Electric Utilities have agreed to consider the emission limitation and rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the limitation and rule citation as a revision to the Ohio SIP for particulate matter.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each coal load-in operation at the coal storage pile in accordance with the following frequencies:

coal storage pile identification:

8.0 acre plant coal storage pile

minimum coal load-in inspection frequency:

daily when in operation
2. Except as otherwise provided in this section, the permittee shall perform inspections of each coal load-out operation at the coal storage pile in accordance with the following frequencies:

coal storage pile identification:

8.0 acre plant coal storage pile

minimum coal load-out inspection frequency:

daily when in operation
3. Except as otherwise provided in this section, the permittee shall perform inspections of each pile working operation associated with the coal storage pile in accordance with the following frequencies:

coal storage pile identification:

8.0 acre plant coal storage pile

minimum coal pile working inspection frequency:

daily when in operation
4. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each coal storage pile in accordance with the following frequencies:

coal storage pile identification:

8.0 acre plant coal storage pile

minimum wind erosion inspection frequency:

daily
5. No inspection shall be necessary for wind erosion from the surface of a pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
6. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for coal load-in or load-out of a storage pile, pile working operations, and wind erosion from the surface of a coal storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
7. The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

III. Monitoring and/or Record Keeping Requirements (continued)

8. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 8.d. shall be kept separately for (i) the coal load-in operations, (ii) the coal load-out operations, (iii) the coal pile working operations, and (iv) the coal pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible emission limitations identified above shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
visible particulate emissions shall not exceed 20% opacity, as a 3-minute average for coal load-in or load-out of the coal storage pile

visible particulate emissions shall not exceed 20% opacity, as a 3-minute average for pile working operations on top of the coal storage pile

Applicable Compliance Method:

Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03*

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
no visible emissions except for 13 minutes during any 60-minute observation period for wind erosion from the coal storage pile surfaces

Applicable Compliance Method:

Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03*

*The procedures related to Test Methods 9 and 22 reflect the settlement agreement reached between Ohio EPA and the Ohio Electric Utilities concerning the Utilities' appeal to the Ohio Environmental Review Appeals Commission of the 1991 revisions and additions to OAC Chapter 3745-17. The revised rule containing these procedures was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the Ohio Electric Utilities have agreed to consider the procedures as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the procedures as a revision to the Ohio SIP for particulate matter.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
load-in or load-out of the coal storage pile (see Section A.1.2.a for the identification of the coal storage pile)	none	none
operation of vehicles on top of the coal storage pile, excluding emissions from the combustion of fuels in such vehicles (i.e., pile working)	none	none
wind erosion from the coal storage pile	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

- If there are no deviations during a calendar quarter that must be reported pursuant to the reporting requirements of this permit, the permittee shall submit a quarterly report, in accordance with paragraph B.8 of the General Terms and Conditions of this permit, which states that no deviations occurred during that quarter.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coal Handling (P901)
Activity Description: Coal unloading and conveying system

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
coal unloading from barges, railcars, or trucks (see Section A.1.2.a), coal conveyors (see Section A.1.2.b), coal handling (see Section A.1.2.c), and coal transfer points (see Section A.1.2.d)	OAC rule 3745-17-07(B)(7)(b)	visible particulate emissions shall not exceed 20% opacity, as a 3-minute average
	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.1.2.e through A.1.2.g)

2. Additional Terms and Conditions

- 2.a The coal unloading stations for barges, railcars, or trucks that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

railcar dumper house
 truck dumping
 'B' dumper house

2. Additional Terms and Conditions (continued)

2.b The coal conveyors that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

- 'AE' belt (reclaim hopper conveyor)
- 'AF' belt (dumper house conveyor)
- 'AG' belt ('AE' belt to transfer tower)
- 'AK' belt (transfer tower to crusher house)
- stacker conveyor
- 'AN' belt (crusher house to transfer point of 'AP' and 'AR' belts)
- 'AP' belt ('AN' belt to Unit #9 Bunker conveyor)
- 'AR' belt ('AN' belt to the Units #6 and #7 Bunkers conveyor)
- Units #6 and #7 conveyor
- 'A' belt ('B' dumper house to 'B' belt)
- 'B' belt ('A' belt to transfer point)
- 'E' belt (transfer point to Units #6 and #7 Bunkers)

2.c The coal handling operations that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

- dumper house
- crusher house

2.d The coal transfer points that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

- dumper house (railcar dumper with 'AF' belt)
- crusher house ('AK' and 'AN' belts)
- transfer tower ('AG' and stacker belts to 'AK' belt)
- southeast junction tower ('P' belt to 'Q' belt)
- 'AE' belt to the 'AG' belt
- 'AN' belt to 'AP' and 'AR' belts
- 'AP' belt to Unit #9 Bunker conveyor
- 'AR' belt to Units #6 and #7 Bunker conveyor
- 'B' dumper house to 'A' belt
- 'B' belt to 'E' belt
- 'E' belt to Units #6 and #7 Bunker conveyor

2. Additional Terms and Conditions (continued)

- 2.e** The permittee shall employ reasonably available control measures on all coal unloading stations for barges, railcars and/or trucks, coal conveyors, coal handling operations, and coal transfer points for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to use adequate enclosures to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.f** For each coal unloading station, coal conveyor, coal handling operation, and coal transfer point that is not adequately enclosed, such unloading station, conveyor, handling operation or transfer point shall be treated with water and/or suitable dust suppression chemicals if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during operation of any coal unloading station, coal conveyor, coal handling, or coal transfer point until further observation confirms that use of the control measures is unnecessary.
- 2.g** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- 1.** Except as otherwise provided in this section, for coal unloading stations that are not adequately enclosed, the permittee shall perform inspections of such coal unloading stations in accordance with the following frequencies:
 - coal unloading station identification:
 - railcar rotary dumper house
 - truck dumping
 - 'B' dumper house
 - minimum inspection frequency:
 - daily when in operation

III. Monitoring and/or Record Keeping Requirements (continued)

2. Except as otherwise provided in this section, for coal conveyors that are not adequately enclosed, the permittee shall perform inspections of such coal conveyors in accordance with the following frequencies:

coal conveyor identification:

'AE' belt

'AF' belt

'AG' belt

'AK' belt

stacker conveyor

'AN' belt

'AP' belt

'AR' belt

Units #6 and #7 conveyor

'A' belt

'B' belt

'E' belt

minimum inspection frequency:

daily when in operation

3. Except as otherwise provided in this section, for coal handling operations that are not adequately enclosed, the permittee shall perform inspections of such coal handling operations in accordance with the following frequencies:

coal handling operation identification:

dumper house

crusher house

minimum inspection frequency:

daily when in operation

III. Monitoring and/or Record Keeping Requirements (continued)

4. Except as otherwise provided in this section, for coal transfer points that are not adequately enclosed, the permittee shall perform inspections of such coal transfer points in accordance with the following frequencies:

coal transfer point identification:

dumper house (railcar dumper with 'AF' belt)

crusher house ('AK' and 'AN' belts)

transfer tower ('AG' and stacker belts to 'AK' belt)

southeast junction tower ('P' belt to 'Q' belt)

'AE' belt to the 'AG' belt

'AN' belt to 'AP' and 'AR' belts

'AP' belts to Unit #9 Bunker conveyor

'AR' belt to Units #6 and #7 Bunker conveyor

'B' dumper house to 'A' belt

'B' belt to 'E' belt

'E' belt to Units #6 and #7 Bunker conveyor

mimimum inspection frequency:

daily when in operation

5. The above-mentioned inspections shall be performed during representative, normal operating conditions.
6. The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.
7. The permittee shall maintain records of the following information:
- the date and reason any required inspection was not performed;
 - the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - the dates the control measures were implemented; and
 - on a calendar quarter basis, the total number of days the control measures were implemented.

The information in 7.d. shall be kept separately for (i) the coal unloading stations, (ii) the coal conveyors, (iii) the coal handling operations, and (iv) the coal transfer points, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible emission limitation for coal unloading, conveyors, handling operations, and transfer points identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.*

*The procedures related to Test Method 9 reflect the settlement agreement reached between Ohio EPA and the Ohio Electric Utilities concerning the Utilities' appeal to the Ohio Environmental Review Appeals Commission of the 1991 revisions and additions to OAC Chapter 3745-17. The revised rule containing these procedures was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the Ohio Electric Utilities have agreed to consider the procedures as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the procedures as a revision to the Ohio SIP for particulate matter.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
coal unloading from barges, railcars, or trucks (see Section A.1.2.a), coal conveyors (see Section A.1.2.b), coal handling (see Section A.1.2.c), and coal transfer points (see Section A.1.2.d)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

- If there are no deviations during a calendar quarter that must be reported pursuant to the reporting requirements of this permit, the permittee shall submit a quarterly report, in accordance with paragraph B.8 of the General Terms and Conditions of this permit, which states that no deviations occurred during that quarter.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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