

Statement of Basis For Title V Permit

Company Name	DP&L, O.H. Hutchings Station	
Premise Number	0857780013	
Number of Non-insignificant Emissions Units	7	
What makes this facility a Title V facility?	Emissions greater than 100 TPY for NOx & SO2	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	YES	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
n/a			

- **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

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

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
B001	20% opacity, as a 6-min average, except as provided by rule	17-07(A)		N	Y	Y	Y	Y	N	OR - None M - COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - USEPA RM 9 Misc. - none
B001	0.10 lb/mmBtu particulate emissions	17-10(C)(1)		N	Y	Y	Y	Y	N	OR - none M - COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - Compliance shall be based upon annual emission testing. Misc. - none
B001	1.6 lbs/mmBtu sulfur dioxide	18-63(M)		N	Y	Y	Y	Y	N	OR - none M - Either employ continuous SO2 monitoring system or analyze daily composite samples of coal burned for sulfur content and heat content. R - If employing continuous SO2 monitor, record average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. If analyzing fuel, record ash content, sulfur content, heat content, and the average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. Rp - If employing SO2 monitoring system, submit quarterly reports of all instances of SO2 values in excess of the 30-day, rolling average SO2 emission rate, and the average daily SO2 emission rate in excess of 1.5 times the SO2 emission limitation. ET - Compliance is based upon a rolling, 30-day average of the daily SO2 emission rates in accordance with the USEPA Policy entitled "Enforcement Policy for SO2 Emission Limitations in Ohio" dated Feb. 11, 1980. If required, compliance testing. Misc. - none
B002	20% opacity, as a 6-min average, except as provided by rule	17-07(A)		N	Y	Y	Y	Y	N	OR - None M - COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - USEPA RM 9 Misc. - none

B002	0.10 lb/mmBtu particulate emissions	17-10(C)(1)		N	Y	Y	Y	Y	N	OR - none M -COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - Compliance shall be based upon annual emission testing. Misc. - none
B002	1.6 lbs/mmBtu sulfur dioxide	18-63(M)		N	Y	Y	Y	Y	N	OR - none M - Either employ continuous SO2 monitoring system or analyze daily composite samples of coal burned for sulfur content and heat content. R - If employing continuous SO2 monitor, record average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. If analyzing fuel, record ash content, sulfur content, heat content, and the average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. Rp - If employing SO2 monitoring system, submit quarterly reports of all instances of SO2 values in excess of the 30-day, rolling average SO2 emission rate, and the average daily SO2 emission rate in excess of 1.5 times the SO2 emission limitation. ET - Compliance is based upon a rolling, 30-day average of the daily SO2 emission rates in accordance with the USEPA Policy entitled "Enforcement Policy for SO2 Emission Limitations in Ohio" dated Feb. 11, 1980. If required, compliance testing. Misc. - none
B003	20% opacity, as a 6-min average, except as provided by rule	17-07(A)		N	Y	Y	Y	Y	N	OR - None M - COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - USEPA RM 9 Misc. - none
B003	0.10 lb/mmBtu particulate emissions	17-10(C)(1)		N	Y	Y	Y	Y	N	OR - none M -COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - Compliance shall be based upon annual emission testing. Misc. - none

B003	1.6 lbs/mmBtu sulfur dioxide	18- 63(M)		N	Y	Y	Y	Y	N	OR - none M - Either employ continuous SO2 monitoring system or analyze daily composite samples of coal burned for sulfur content and heat content. R - If employing continuous SO2 monitor, record average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. If analyzing fuel, record ash content, sulfur content, heat content, and the average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. Rp - If employing SO2 monitoring system, submit quarterly reports of all instances of SO2 values in excess of the 30-day, rolling average SO2 emission rate, and the average daily SO2 emission rate in excess of 1.5 times the SO2 emission limitation. ET - Compliance is based upon a rolling, 30-day average of the daily SO2 emission rates in accordance with the USEPA Policy entitled "Enforcement Policy for SO2 Emission Limitations in Ohio" dated Feb. 11, 1980. If required, compliance testing. Misc. - none
B004	20% opacity, as a 6-min average, except as provided by rule	17- 07(A)		N	Y	Y	Y	Y	N	OR - None M - COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - USEPA RM 9 Misc. - none
B004	0.10 lb/mmBtu particulate emissions	17- 10(C)(1)		N	Y	Y	Y	Y	N	OR - none M -COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - Compliance shall be based upon annual emission testing. Misc. - none
B004	1.6 lbs/mmBtu sulfur dioxide	18- 63(M)		N	Y	Y	Y	Y	N	OR - none M - Either employ continuous SO2 monitoring system or analyze daily composite samples of coal burned for sulfur content and heat content. R - If employing continuous SO2 monitor, record average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. If analyzing fuel, record ash content, sulfur content, heat content, and the average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. Rp - If employing SO2 monitoring system, submit quarterly reports of all instances of SO2 values in excess of the 30-day, rolling average SO2 emission rate, and the average daily SO2 emission rate in excess of 1.5 times the SO2 emission limitation. ET - Compliance is based upon a rolling, 30-day average of the daily SO2 emission rates in accordance with the USEPA Policy entitled "Enforcement Policy for SO2 Emission Limitations in Ohio" dated Feb. 11, 1980. If required, compliance testing. Misc. - none

B005	20% opacity, as a 6-min average, except as provided by rule	17-07(A)		N	Y	Y	Y	Y	N	OR - None M - COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - USEPA RM 9 Misc. - none
B005	0.10 lb/mmBtu particulate emissions	17-10(C)(1)		N	Y	Y	Y	Y	N	OR - none M -COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - Compliance shall be based upon annual emission testing. Misc. - none
B005	1.6 lbs/mmBtu sulfur dioxide	18-63(M)		N	Y	Y	Y	Y	N	OR - none M - Either employ continuous SO2 monitoring system or analyze daily composite samples of coal burned for sulfur content and heat content. R - If employing continuous SO2 monitor, record average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. If analyzing fuel, record ash content, sulfur content, heat content, and the average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. Rp - If employing SO2 monitoring system, submit quarterly reports of all instances of SO2 values in excess of the 30-day, rolling average SO2 emission rate, and the average daily SO2 emission rate in excess of 1.5 times the SO2 emission limitation. ET - Compliance is based upon a rolling, 30-day average of the daily SO2 emission rates in accordance with the USEPA Policy entitled "Enforcement Policy for SO2 Emission Limitations in Ohio" dated Feb. 11, 1980. If required, compliance testing. Misc. - none
B006	20% opacity, as a 6-min average, except as provided by rule	17-07(A)		N	Y	Y	Y	Y	N	OR - None M - COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - USEPA RM 9 Misc. - none
B006	0.10 lb/mmBtu particulate emissions	17-10(C)(1)		N	Y	Y	Y	Y	N	OR - none M -COM to continuously monitor and record opacity. R - Continuously record opacity. Rp - Quarterly opacity reports. ET - Compliance shall be based upon annual emission testing. Misc. - none

B006	1.6 lbs/mmBtu sulfur dioxide	18- 63(M)		N	Y	Y	Y	Y	N	<p>OR - none</p> <p>M - Either employ continuous SO2 monitoring system or analyze daily composite samples of coal burned for sulfur content and heat content.</p> <p>R - If employing continuous SO2 monitor, record average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu. If analyzing fuel, record ash content, sulfur content, heat content, and the average daily and 30-day, rolling SO2 emission rate in lbs/mmBtu.</p> <p>Rp - If employing SO2 monitoring system, submit quarterly reports of all instances of SO2 values in excess of the 30-day, rolling average SO2 emission rate, and the average daily SO2 emission rate in excess of 1.5 times the SO2 emission limitation.</p> <p>ET - Compliance is based upon a rolling, 30-day average of the daily SO2 emission rates in accordance with the USEPA Policy entitled "Enforcement Policy for SO2 Emission Limitations in Ohio" dated Feb. 11, 1980. If required, compliance testing.</p> <p>Misc. - none</p>
B007	20% opacity, as a 6-min average, except as provided by rule	17- 07(A)(1)		Y	Y	Y	Y	N	N	<p>OR - Burn only natural gas/No.2 fuel oil.</p> <p>M - Monitor when fuel other than natural gas/No. 2 fuel oil are used.</p> <p>R - For each day a fuel other than nat. gas/ No. 2 fuel is burned, maintain a record of the type and quantity of fuel burned.</p> <p>Rp - Deviation reports that identify each day when fuel other than natural gas/No. 2 fuel oil were burned (within 30 days of the deviation).</p> <p>ET - USEPA RM 9.</p> <p>Misc. none</p>
B007	0.04 lb/mmBtu particulate	17- 11(B)(4)		Y	Y	Y	Y	N	N	<p>OR - Burn only natural gas/No.2 fuel oil.</p> <p>M - Monitor when fuel other than natural gas/No. 2 fuel oil are used.</p> <p>R - For each day a fuel other than nat. gas/ No. 2 fuel is burned, maintain a record of the type and quantity of fuel burned.</p> <p>Rp - Deviation reports that identify each day when fuel other than natural gas/No. 2 fuel oil were burned (within 30 days of the deviation).</p> <p>ET - AP-42 emission factors. If required, emissions testing.</p> <p>Misc. - none</p>
B007	0.5 lb/mmBtu sulfur dioxide	18- 63(M)(2)		Y	Y	Y	Y	N	N	<p>OR - Burn only natural gas/No.2 fuel oil. Quality of fuel burned shall meet a sulfur content that is sufficient to comply with sulfur dioxide emission rate.</p> <p>M - Monitor when fuel other than natural gas/No. 2 fuel oil are used. Permittee or supplier shall analyze each shipment of fuel oil for sulfur content and heat content.</p> <p>R - Record quantity of oil received, sulfur content and heat content and calculated sulfur dioxide emission rate.</p> <p>Rp - Deviation reports that identify each day when fuel other than natural gas/No. 2 fuel oil were burned (within 30 days of the deviation). Deviation reports for sulfur dioxide emissions (within 45 days of the deviation).</p> <p>ET - none</p> <p>Misc. - none</p>

F002	20% opacity, as a three min. avg.	17-07(B)(7)(b)		N	Y	Y	Y	Y	N	OR - none M - Perform inspections on a daily basis. R - Maintain daily records of the inspections. Rp - Deviation reports for inspections. ET - USEPA RM 9 Misc. - none
F002	Employ RACM	17-08(B)		N	Y	Y	Y	Y	N	OR - none M - Perform inspections on a daily basis. R - Maintain daily records of the inspections. Rp - Deviation reports for inspections. ET - USEPA RM 9 Misc. - none
F004	20% opacity, as a 3-min avg. for load-in and load-out	17-07(B)(7)(b)		N	Y	Y	Y	Y	N	OR - none M - Perform inspections on a daily basis. R - Maintain daily records of the inspections. Rp - Deviation reports for inspections. ET - USEPA RM 9 Misc. - none
F004	No VE except for 13 min. within 60 min from storage piles	17-07(B)(7)(d)		N	Y	Y	Y	Y	N	OR - none M - Perform inspections on a daily basis. R - Maintain daily records of the inspections. Rp - Deviation reports for inspections. ET - USEPA RM 22 Misc. - none
F004	Employ RACM	17-08(B)		N	Y	Y	Y	Y	N	OR - none M - Perform inspections on a daily basis. R - Maintain daily records of the inspections. Rp - Deviation reports for inspections. ET - USEPA RM 9 or 22 Misc. - none
Z002	20% opacity, as a 3-min. avg.	17-07(B)		N	N	N	N	Y	N	OR - none M - none R - none Rp - none ET - USEPA RM 9 Misc. - none
Z002	RACM	17-08(B)		N	Y	Y	Y	N	N	OR - none M - Monthly monitoring of visible fugitive particulate emissions. R - Maintain records of presence or absence of VEs. Rp - Semiannual reports of record keeping requirements. ET - none Misc. - none

EU = emissions unit id

OR = operational restriction

M = monitoring requirements
R = recordkeeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

- **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For each column where “N” is specified, there should be a brief explanation in the “Comments” section. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
 2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
 3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.
- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.