

Statement of Basis For Title V Permit

Company Name	Ohio University Lausche Heating Plant		
Premise Number	06-05-01-0016		
Number of Non-insignificant Emissions Units	6		
What makes this facility a Title V facility?	SO2, NOx		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Y		

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
none			

- **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							
B036 B037	0.020 pound PM per million Btu	17-10 (B)(1)		Y	Y	Y	Y	N	N	<p>Compliance with the mass emission limit is assumed based on the AP-42 emission factor listed. Emission testing, if required, is also specified.</p> <p>OR: this emissions unit is restricted to burning only natural gas. Appropriate monitoring, record keeping, and reporting requirements have been included in the permit. CAM is currently not applicable.</p> <p>These emissions unit are considered to be an inherently clean emissions unit because they are <u>uncontrolled</u> emissions units that burns only natural gas, the particulate emissions are due solely to the combustion of the fuel, and under normal operating conditions the emissions will not exceed the particulate or visible emission limitations.</p>
B041 B042 B043	0.15 pound PM per million Btu	17-10 (C)(1)		N	Y	Y	Y	Y	N	<p>Compliance with the mass emission limit is based on emission testing. Continuous opacity monitoring (COM) data is used to ensure ongoing compliance with the mass emission limit.</p>
B036 B037	20% opacity as a 6-minute average	17- 07(A)		Y	Y	Y	Y	N	Y	<p>Compliance with the visible emission limit is assumed because natural gas is the only fuel burned in this emissions unit. Visible emission testing, if required, is also specified.</p> <p>OR: this emissions unit is restricted to burning only natural gas. Appropriate monitoring, record keeping, and reporting requirements have been included in the permit. CAM is currently not applicable.</p> <p>These emissions unit are considered to be an inherently clean emissions unit because they are <u>uncontrolled</u> emissions units that burns only natural gas, the particulate emissions are due solely to the combustion of the fuel, and under normal operating conditions the emissions will not exceed the particulate or visible emission limitations.</p>

B041 B042 B043 B058	20% opacity as a 6-minute average	17-07(A)		N	Y	Y	Y	Y	N	Compliance with the visible emission limit is based on visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
B041 B042 B043	4.70 pounds SO2 per million Btu	18 - 11(C)		Y	Y	Y	Y	N	N	Compliance with the sulfur dioxide emission limit is determined through coal sampling and analysis.
B041	0.1 pound NOx per million Btu		Y	Y	Y	Y	Y	N	N	BAT limit established pursuant to federally enforceable PTI 06-3015. Compliance with the mass emission limit is assumed based on the AP-42 emission factor listed, with use of low NOx burners. Emission testing, if required, is also specified. OR: this emissions unit is restricted to burning only natural gas. Appropriate monitoring, record keeping, and reporting requirements have been included in the permit. CAM is currently not applicable.
B058	0.020 pound PM per million Btu		Y	Y	Y	Y	Y	N	N	BAT limit established pursuant to federally enforceable PTI 06-3816. Compliance with the mass emission limit is assumed based on the AP-42 emission factor listed. Emission testing, if required, is also specified. OR: this emissions unit is restricted to burning only natural gas. Appropriate monitoring, record keeping, and reporting requirements have been included in the permit. CAM is currently not applicable. This emissions unit is considered to be an inherently clean emissions unit because it is an <u>uncontrolled</u> emissions unit that burns only natural gas, the particulate emissions from the emissions unit are due solely to the combustion of the fuel, and under normal operating conditions the emissions will not exceed the particulate or visible emission limitations.
B058	5.48 lbs CO/hr 0.08 lb SO2/hr		Y	Y	Y	Y	Y	N	N	BAT limits established pursuant to federally enforceable PTI 06-3816. Compliance with the mass emission limits are assumed based on the AP-42 emission factors listed. Emission testing, if required, is also specified.

B058	1.88 tons PM/year; 39.0 tons NOx/year 15.0 CO/year; 0.23 ton SO2/year		Y	Y	Y	Y	Y	N	N	PSD limits established pursuant to federally enforceable PTI 06-3816. Compliance with the annual mass emission limits is achieved based on compliance with the rolling 12-month natural gas usage limit. OR: this emissions unit is restricted to burning only natural gas. Appropriate monitoring, record keeping, and reporting requirements have been included in the permit. CAM is currently not applicable.
B058	0.1 pound NOx per million Btu		Y	Y	Y	Y	Y	N	N	NSPS Subpart Db NOx limit. Continuous emission monitoring (CEM) data is used to ensure ongoing compliance with the mass emission limit. OR: this emissions unit is restricted to burning only natural gas. Appropriate monitoring, record keeping, and reporting requirements have been included in the permit. CAM is currently not applicable.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

• **Instructions for Part III:**

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

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general

explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, 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.

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

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