



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

02/28/02

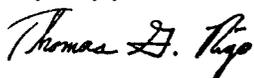
**RE: Proposed Title V Chapter 3745-77 Permit
02-47-08-0049
EDGEWATER PLANT**

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for EDGEWATER PLANT, has been created in Ohio EPA's State Air Resources System (STARS) on 02/28/02, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,



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

cc: Northeast District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 02/28/02	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
----------------------	---	--

This document constitutes issuance of a Title V permit for Facility ID: 02-47-08-0049 to:
 EDGEWATER PLANT
 200 OBERLIN AVENUE
 LORAIN, OH 44052-0000

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B003 (MULTI-FUEL-FIRE) MULTI-FUEL-FIRED UTILITY BOILER #13	F001 (PLANT ROADWAYS) PLANT ROADWAYS AND PARKING AREAS	P001 (COAL PULVERIZER) COAL PULVERIZERS AND DRYERS/PULVERIZER MILLS (A-D)
B004 (OIL/GAS-FIRED C) OIL/GAS-FIRED COMBUSTION TURBINE A-CT	F002 (COAL PILE) COAL PILE	P002 (PULVERIZED COAL STORAGE AND TRUCK LOADOUT)
B005 (OIL/GAS-FIRED C) OIL/GAS-FIRED COMBUSTION TURBINE B-CT	F003 (COAL HANDLING SYSTEM) COAL HANDLING SYSTEM	PULVERIZED COAL TRANSFER AND STORAGE BINS
B006 (AUXILIARY BOILER) AUXILLARY STEAM-HEATING BOILER	F004 (ASH HANDLING EQUIPMENT) FLY-ASH CONVEYING, STORAGE SILO AND LOADING EQUIPMENT	

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 3745-77-08(E) 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 Record Keeping 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- 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 record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - 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 record keeping 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 (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of 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.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, 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, record keeping, 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.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))
- 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

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 condition, of any emissions unit(s) 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 upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

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.

(Authority for term: OAC rule 3745-77-07(A)(5))

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

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.

(Authority for term: OAC rule 3745-77-07(A)(8))

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.

(Authority for term: OAC rule 3745-77-07(A)(9))

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.

(Authority for term: OAC rule 3745-77-07(A)(10))

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 (18) 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.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

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.

(Authority for term: OAC rule 3745-77-07(B))

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 Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA 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.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

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.

(Authority for term: OAC rule 3745-77-07(F))

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).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

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.

(Authority for term: OAC rule 3745-77-07(G))

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 of the U.S. EPA, 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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

(Authority for term: OAC rule 3745-77-07(I))

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.

(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping 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.)

2. Records Retention Requirements

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, but not be limited to, 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.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. 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).

5. 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.

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 Enforcable 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.
3. Emissions units B001 and B002 have not been operated during the past six years. Before these emissions units are granted authorization to operate, the permittee shall comply with all applicable federal and Ohio EPA new source review requirements and federal New Source Performance Standards, and demonstrate compliance with all applicable emission limitations and control requirements by performing emission tests in accordance with approved U.S. EPA methods and procedures.

B. State Only Enforceable Section

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

T001 - 48,000-gallon fuel oil storage tank no. 1;
T002 - 48,000-gallon fuel oil storage tank no. 2;
T003 - 48,000-gallon fuel oil storage tank no. 3;
T004 - 48,000-gallon fuel oil storage tank no. 4;
T005 - 48,000-gallon fuel oil storage tank no. 5;
T006 - 48,000-gallon fuel oil storage tank no. 6;
T007 - 48,000-gallon fuel oil storage tank no. 7;
T008 - 48,000-gallon fuel oil storage tank no. 8;
T009 - 48,000-gallon fuel oil storage tank no. 9;
T010 - 48,000-gallon fuel oil storage tank no. 10;
Z011 - 15,000-gallon fuel oil storage tank no. 11;
Z012 - 1,500-gallon fuel oil storage tank no. 12;
Z013 - 1,500-gallon fuel oil storage tank no. 13;
Z014 - 2,500-gallon fuel oil storage tank no. 14;
Z015 - 300-gallon fuel oil storage tank no. 15;
Z016 - 6,000-gallon lube oil storage tank no. 16;
Z017 - 850-gallon lube oil storage tank no. 17;
Z018 - 2,500-gallon lube oil storage tank no. 18;
Z019 - 3,500-gallon lube oil storage tank no. 19;
Z020 - 250-gallon fuel oil storage tank no. 20;
Z021 - 800-gallon fuel oil storage tank no. 21;
Z022 - 800-gallon fuel oil storage tank no. 22;
Z023 - 800-gallon fuel oil storage tank no. 23;
Z024 - 1,000-gallon fuel oil storage tank no. 24;
Z025 - 275-gallon fuel oil storage tank no. 25;
Z026 - 1,700-gallon fuel oil storage tank no. 26;
Z027 - 1,700-gallon fuel oil storage tank no. 27; and
Z028 - 25 KW emergency diesel generator.

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: MULTI-FUEL-FIRE (B003)
Activity Description: MULTI-FUEL-FIRED UTILITY BOILER #13

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, distillate oil (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil), natural gas, and on-specification used oil-fired, dry bottom, utility boiler having a nominal heat input capacity range of 1020 - 1125 mmBtu/hr (depending on the fuel(s) fired) and controlled with an electrostatic precipitator (ESP) when firing coal.	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	When firing coal, particulate emissions shall not exceed 0.10 lb/mmBtu actual heat input.
	OAC rule 3745-18-53(D)(1)	When firing distillate oil or natural gas, particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input. Sulfur dioxide emissions shall not exceed 3.4 lbs/mmBtu actual heat input.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05 (PTI 02-9993)	When co-firing on-specification used oil and natural gas the following emission limitations shall not be exceeded: Particulate emissions shall not exceed 0.02 lb/mmBtu. Sulfur dioxide emissions shall not exceed 1.7 lbs/mmBtu. Nitrogen oxides emissions shall not exceed 457.4 lbs/hr. Carbon monoxide emissions shall not exceed 76.01 lbs/hr. Organic compound emissions shall not exceed 6.87 lbs/hr. See Sections A.I.2.b and A.II below.

2. Additional Terms and Conditions

- 2.a This emissions unit is not currently subject to the requirements specified in 40 CFR Part 60, Subpart D (Standards of Performance for Fossil Fuel Fired Generators) or 40 CFR Part 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units.)
- 2.b Ohio EPA Permit to Install 02-9993, issued on April 24, 1996, allows for the firing of on-specification used oil in this emissions unit through the existing fuel oil burners. The permit to install does not authorize an increase of the maximum heat input capacity of the emissions unit. The on-specification used oil fired in this emissions unit shall be used to produce steam for the generation of electricity.
- 2.c All used oil burned in this emissions unit shall be 'on-specification used oil' in accordance with the definitions specified in 40 CFR Part 279 and OAC rule 3745-279-11.

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 maximum amount of on-specification used oil fired in this emissions unit shall be limited to 3,163.2 gallons per hour (equivalent to a maximum of 30% of the emissions unit's total heat input) and 27,709,632 gallons per rolling, 12-month period.
- 3. On-specification used oil shall not be fired during emissions unit start-ups or shutdowns. On-specification used oil shall not be fired until the emissions unit reaches normal operating temperatures.

II. Operational Restrictions (continued)

4. All on-specification used oil fired in this emissions unit shall meet the following specifications:

Contaminant/Property	Allowable Specifications
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
PCB's	50 ppm, maximum
total halogens	1000 ppm, maximum
mercury	1 ppm, maximum
flash point	100 degrees Fahrenheit, minimum
heat content	100,000 Btu/gallon, minimum
sulfur	1.3%, by weight, maximum

* If the permittee is burning used oil with any quantifiable level (2 ppm) of PCB's, then the permittee is subject to the notification requirements of 40 CFR 279.62.

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.

This continuous monitoring system consists of all the equipment used to acquire data and includes the 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 when firing coal: 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.

The permittee shall maintain records of the following data obtained by the continuous sulfur dioxide monitoring system when firing distillate oil, natural gas, or when co-firing natural gas and on-specification used oil: the average daily 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 results of the coal analyses for ash content, sulfur content, heat content, the average sulfur dioxide emission rate (lbs/mmBtu), and the rolling, 30-day weighted average sulfur dioxide emission rate (lbs/mmBtu). The analyses for ash content, sulfur content, and heat content shall be performed 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.

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

4. If oil sampling and analysis is used to demonstrate compliance with the sulfur dioxide emission limitation, the permittee shall maintain records of the distillate 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.

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).)

5. 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.
6. The permittee shall maintain daily records of the following:
- a. the total quantity of coal fired, in tons;
 - b. the total quantity of distillate oil fired, in gallons; and
 - c. the total quantity of natural gas fired in this emissions unit, in mm cu.ft.
7. The permittee shall receive a chemical analysis with each shipment of used oil from the supplier. The analysis shall identify the name and address of the supplier, the supplier's USEPA identification number, and the following information:
- a. date of shipment or delivery;
 - b. quantity of used oil received;
 - c. the Btu value of the used oil;
 - d. the flash point of the used oil;
 - e. the arsenic content;
 - f. the cadmium content;
 - g. the chromium content;
 - h. the lead content;
 - i. the PCB content;
 - j. the total halogen content;
 - k. the mercury content; and
 - l. the sulfur content.

The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of any used oil shipment received by this facility, of any used oil stored at this facility, or of any used oil sampled at the emissions unit.

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

8. The permittee shall conduct or have performed an analysis of a representative sample of used oil from any used oil storage tank located at the facility on an annual basis. The analysis shall be performed to determine conformance with the contaminant specifications identified in Section A.II.4.
9. The permittee shall maintain monthly records of the following:
 - a. the quantity of used oil fired, in gallons;
 - b. the rolling, 12-month summation of the quantity of used oil fired, in gallons;
 - c. the total number of hours the emissions unit was operated while firing used oil; and
 - d. the average hourly used oil firing rate, in gallons/hr.
10. When operating the ESP, 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

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.

IV. Reporting Requirements (continued)

2. If the continuous sulfur dioxide monitoring system is used to demonstrate compliance with the sulfur dioxide emission limitation when firing coal, 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.

If the continuous sulfur dioxide monitoring system is used to demonstrate compliance with the sulfur dioxide emission limitation when firing distillate oil, natural gas, or when co-firing natural gas and on-specification used oil, 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 sulfur dioxide emission rate (lb/mmBtu).

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.
4. If distillate oil 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 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.
5. The permittee shall notify the Director (the Ohio EPA, Northeast District Office) in writing of any record which shows a deviation of the hourly or rolling, 12-month used oil usage limitations based upon the calculated used oil usage 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 30 days after the deviation occurs.
6. The permittee shall notify the USEPA and the Ohio EPA in writing if used oil which exceeds the specifications in Section A.II.4 is fired in this emissions unit. The notification shall include a copy of the used oil analysis and shall be sent to the USEPA and the Ohio EPA within 30 days of becoming aware of such occurrence.

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 within 60 days after coal is fired in this emissions unit. The frequency for future particulate emission tests will be determined based upon the results of the emission tests conducted while firing coal in accordance with Ohio EPA Engineering Guide 16.

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

The test(s) shall be conducted while the emissions unit is firing coal and operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

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, Northeast District Office 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 emission 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 Ohio EPA, Northeast District Office.

2. Emission Limitation:
When firing distillate oil or natural gas, particulate emissions shall not exceed .020 lb/mmBtu actual heat input.

Applicable Compliance Method:

When firing distillate oil, compliance may be determined by multiplying an emission factor of 2.0 lbs of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (8035.7 gallons/hr) and dividing by the emissions unit's rated heat input capacity (1125 mmBtu/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

When firing natural gas, compliance may be determined by multiplying an emission factor of 1.9 lbs of particulates/mm standard cu. ft. by the emissions unit's maximum hourly natural gas firing capacity (1.103 mm standard cu. ft./hr) and dividing by the emissions unit's rated heat input capacity (1125 mmBtu/hr). This 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 this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9), while firing distillate oil.

3. Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

4. When firing coal, 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 average daily and rolling, 30-day sulfur dioxide emission rates shall be determined and reported in accordance with the applicable requirements of Sections 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.
5. When firing distillate oil, 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 required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 6.

6. When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 6.

7. Emission Limitation:
When co-firing on specification used oil and natural gas, particulate emissions shall not exceed 0.02 lb/mmBtu.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by summing the lbs/hr values generated from the co-firing of on-specification used oil and natural gas and dividing by the emissions unit's total heat input for this firing scenario (1054 mmBtu/hr). The lbs/hr value from the firing of on-specification used oil may be determined by multiplying the restricted maximum hourly firing rate (3163.2 gallons/hr) by an emission factor of 2.0 lbs/1000 gallons. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98). The lbs/hr value from the firing of natural gas may be determined by multiplying the restricted maximum hourly firing rate (.7166 mm cu. ft./hr) by an emission factor of 1.9 lbs/mm cu. ft. This 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 this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

8. Emission Limitation:
When co-firing on specification used oil and natural gas, sulfur dioxide emissions shall not exceed 1.7 lbs/mmBtu.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by summing the lb(s)/hr values generated from the co-firing of on-specification used oil and natural gas and dividing by the emissions unit's total heat input for this firing scenario (1054 mmBtu/hr). The lbs/hr value from the firing of on-specification used oil may be determined by multiplying the restricted maximum hourly firing rate (3163.2 gallons/hr) by an emission factor of 157(S) lbs/1000 gallons (where S = the percent sulfur in the on-specification used oil). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98). The lb/hr value from the firing of natural gas may be determined by multiplying the restricted maximum hourly firing rate (.7166 mm cu. ft./hr) by an emission factor of 0.6 lb/mm cu. ft. This 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 this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 6.

V. Testing Requirements (continued)

9. Emission Limitation:
When co-firing on specification used oil and natural gas, nitrogen oxides emissions shall not exceed 457.4 lbs/hr.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by summing the lbs/hr values generated from the co-firing of on-specification used oil and natural gas. The lbs/hr value from the firing of on-specification used oil may be determined by multiplying the restricted maximum hourly firing rate (3163.2 gallons/hr) by an emission factor of 24.0 lbs/1000 gallons. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98). The lbs/hr value from the firing of natural gas may be determined by multiplying the restricted maximum hourly firing rate (.7166 mm cu. ft./hr) by an emission factor of 280 lbs/mm cu. ft. This 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 (7/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

10. Emission Limitation:
When co-firing on specification used oil and natural gas, carbon monoxide emissions shall not exceed 76.01 lbs/hr.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by summing the lbs/hr values generated from the co-firing of on-specification used oil and natural gas. The lbs/hr value from the firing of on-specification used oil may be determined by multiplying the restricted maximum hourly firing rate (3163.2 gallons/hr) by an emission factor of 5.0 lbs/1000 gallons. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98). The lbs/hr value from the firing of natural gas may be determined by multiplying the restricted maximum hourly firing rate (.7166 mm cu. ft./hr) by an emission factor of 84.0 lbs/mm cu. ft. This 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 (7/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

11. Emission Limitation:
When co-firing on specification used oil and natural gas, organic compound emissions shall not exceed 6.87 lbs/hr.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by summing the lbs/hr values generated from the co-firing of on-specification used oil and natural gas. The lb/hr value from the firing of on-specification used oil may be determined by multiplying the restricted maximum hourly firing rate (3163.2 gallons/hr) by an emission factor of 0.2 lb/1000 gallons. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-2 (10/96). The lbs/hr value from the firing of natural gas may be determined by multiplying the restricted maximum hourly firing rate (.7166 mm cu. ft./hr) by an emission factor of 8.7 lbs/mm cu. ft. (NMTOC). This 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 this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

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, distillate oil (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil), natural gas, and on-specification used oil-fired, dry bottom, utility boiler having a nominal heat input capacity range of 1020 - 1125 mmBtu/hr (depending on the fuel(s) fired) and controlled with an electrostatic precipitator (ESP) when firing coal.		

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 documenting activities relating to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. A logbook documenting activities relating 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: OIL/GAS-FIRED C (B004)
Activity Description: OIL/GAS-FIRED COMBUSTION TURBINE A-CT

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>
Natural gas or distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) combustion turbine used to generate electricity, having a nominal heat input capacity of 347 mmBtu/hr. (Combustion Turbine A)	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 0.040 lb/mmBtu actual heat input.
	OAC rule 3745-18-53(D)(2)	Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input.

2. Additional Terms and Conditions

- 2.a This emissions unit is not currently subject to the requirement specified in 40 CFR Part 60, Subpart GG - Standards of Performance for Stationary Gas Turbines.

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 natural gas and/or distillate oil 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.

- 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).

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 prohibited fuel (i.e., one other than natural gas and/or distillate oil), 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 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 prohibited fuel (i.e., one other than natural gas and/or 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:
 - 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).

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
Particulate emissions shall not exceed 0.040 lb/mmBtu actual heat input.

Applicable Compliance Method:

When firing distillate oil, compliance may be based upon an emission factor of 0.0043 lb/mmBtu. When firing natural gas, compliance may be based upon an emission factor of 0.019 lb/mmBtu. These emission factors are specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (04/00).

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:

When firing distillate oil, compliance with the allowable sulfur dioxide emission limitation may 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.

When firing natural gas, compliance with this limitation may be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 6 while firing distillate 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>
---	---	--

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: OIL/GAS-FIRED C (B005)
Activity Description: OIL/GAS-FIRED COMBUSTION TURBINE B-CT

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>
Natural gas or distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) combustion turbine used to generate electricity, having a nominal heat input capacity of 347 mmBtu/hr. (Combustion Turbine B)	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 0.040 lb/mmBtu actual heat input.
	OAC rule 3745-18-53(D)(2)	Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input.

2. Additional Terms and Conditions

- 2.a This emissions unit is not currently subject to the requirement specified in 40 CFR Part 60, Subpart GG - Standards of Performance for Stationary Gas Turbines.

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 natural gas and/or distillate oil 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.

- 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).

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 prohibited fuel (i.e., one other than natural gas and/or distillate oil), 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 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 prohibited fuel (i.e., one other than natural gas and/or 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:
 - 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).

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
Particulate emissions shall not exceed 0.040 lb/mmBtu actual heat input.

Applicable Compliance Method:

When firing distillate oil, compliance may be based upon an emission factor of 0.0043 lb/mmBtu. When firing natural gas, compliance may be based upon an emission factor of 0.019 lb/mmBtu. These emission factors are specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (04/00).

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:

When firing distillate oil, compliance with the allowable sulfur dioxide emission limitation may 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.

When firing natural gas, compliance with this limitation may be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 6 while firing distillate 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>
---	---	--

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: AUXILIARY BOILER (B006)
Activity Description: AUXILLARY STEAM-HEATING BOILER

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>
Distillate oil (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) and natural gas-fired steam boiler, having a nominal heat input capacity of 16.8 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 3745-17-10(B)(1)	The particulate emission limitation from this rule is equivalent to the particulate emission limitation from OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart Dc	When firing distillate oil, sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input.
	OAC rule 3745-21-08	None, see Section A.I.2.a below.
	OAC rule 3745-23-06	None, see Section A.I.2.a below.
	OAC rule 3745-18-53(A)(1)	The sulfur dioxide emission limitation from this rule is less stringent than the sulfur dioxide emission limitations from 40 CFR Part 60 and OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05 (PTI 02-9622)	Particulate emissions shall not exceed 0.34 lb/hr. Sulfur dioxide emissions shall not exceed 8.64 lbs/hr. Nitrogen oxides emissions shall not exceed 2.43 lbs/hr. Carbon monoxide emissions shall not exceed 1.4 lbs/hr. Organic compound emissions shall not exceed 0.14 lb/hr. Compliance with this rule also includes compliance with OAC rule 3745-17-07(A) and the applicable provisions in 40 CFR Part 60, Subpart Dc. See A.I.2.b 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 02-9622.
- 2.b The emission limitations established pursuant to OAC rule 3745-31-05(A)(3) represent the potential to emit for those pollutants while firing distillate oil; therefore, there are no additional monitoring, record keeping or reporting requirements associated with these emission limitations.

II. Operational Restrictions

- 1. The permittee shall burn only natural gas and/or distillate oil in this emissions unit.
- 2. 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.

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.

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.

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).

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 prohibited fuel (i.e., one other than natural gas and/or distillate oil), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
4. The permittee shall maintain records of the total quantity of distillate oil and natural gas fired during each day.

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 limitations based upon 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 prohibited fuel (i.e., one other than natural gas and/or 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:
 - 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).

V. Testing Requirements (continued)

1.b Emission Limitation:
When firing distillate oil, sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may 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 required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 6.

1.c Emission Limitation:
Particulate emissions shall not exceed 0.34 lb/hr.

Applicable Compliance Method:

When firing distillate oil, compliance may be determined by multiplying an emission factor of 2.0 lbs/1000 gallons by the emissions unit's maximum hourly distillate oil firing rate (120 gallons/hr).

When firing natural gas, compliance may be determined by multiplying an emission factor of 1.9 lbs/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (.0163 mm cu. ft./hr).

The emission factors for distillate oil and natural gas are specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98) and Section 1.4, Table 1.4-2 (7/98), respectively.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:
Sulfur dioxide emissions shall not exceed 8.64 lbs/hr.

Applicable Compliance Method:

When firing distillate oil, compliance may be determined based upon the records required pursuant to Section A.III.1 multiplied by the emissions unit's total heat input capacity (16.8 mmBtu/hr).

When firing natural gas, compliance with this emission limitation may 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 (.0163 mm cu. ft./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 this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
Nitrogen oxides emissions shall not exceed 2.44 lbs/hour.

Applicable Compliance Method:

When firing distillate oil, compliance may be determined by multiplying an emission factor of 20 lbs/1000 gallons by the emissions unit's maximum hourly distillate oil firing rate (120 gallons/hr).

When firing natural gas, compliance may be determined by multiplying an emission factor of 100 lbs/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (.0163 mm cu. ft./hr).

The emission factors for distillate oil and natural gas are specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98) and Section 1.4, Table 1.4-1 (7/98), respectively.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

- 1.f** Emission Limitation:
Carbon monoxide emissions shall not exceed 1.4 lbs/hr.

Applicable Compliance Method:

When firing distillate oil, compliance may be determined by multiplying an emission factor of 5.0 lbs/1000 gallons by the emissions unit's maximum hourly distillate oil firing rate (120 gallons/hr).

When firing natural gas, compliance may be determined by multiplying an emission factor of 84.0 lbs/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (.0163 mm cu. ft./hr).

The emission factors for distillate oil and natural gas are specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98) and Section 1.4, Table 1.4-1 (7/98), respectively.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

- 1.g** Emission Limitation:
Organic compound emissions shall not exceed 0.14 lb/hr.

Applicable Compliance Method:

When firing distillate oil, compliance may be determined by multiplying an emission factor of 0.2 lb/1000 gallons by the emissions unit's maximum hourly distillate oil firing rate (120 gallons/hr).

When firing natural gas, compliance may be determined by multiplying an emission factor of 8.7 lbs/mm cu. ft. (NMTOC) by the emissions unit's maximum hourly natural gas firing rate (.0163 mm cu. ft./hr).

The emission factors for distillate oil and natural gas are specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-3 (9/98) and Section 1.4, Table 1.4-2 (7/98), respectively.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

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>
---	---	--

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: PLANT ROADWAYS (F001)
Activity Description: PLANT ROADWAYS AND PARKING AREAS

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>
paved roadways and parking areas (see Section A.1.2.a)	OAC rule 3745-17-07(B)(7)(a)(ii) (see Section A.1.2.k)	no visible particulate emissions except for 6 minutes during any 60-minute period
unpaved roadways and parking areas (see Section A.1.2.b)	OAC rule 3745-17-07(B)(7)(a)(ii) (see Section A.1.2.k)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(2)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.1.2.f through A.1.2.j)
	OAC rule 3745-17-08(B), (B)(8), (B)(9)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.1.2.c, A.1.2.d, A.1.2.e, A.1.2.g, A.1.2.i and A.1.2.j)

2. Additional Terms and Conditions

- 2.a** The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Paved Roadways:

Concrete driveway off Oberlin Ave. on northside of substation.

Main asphalt driveway, L-shaped, begins off Oberlin Ave. on southside of plant and turns north along the westside of the plant.

Asphalt driveway along northside of plant.

Paved Parking Areas:

Asphalt paved parking lot south of main driveway.

Asphalt paved parking lot along the south corner of the plant.

Asphalt paved parking lot southwest of plant.

- 2.b** The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Unpaved Roadways:

Gravel-based roadways around the coal pile on the northside of the plant.

Unpaved Parking Areas:

None

- 2.c** The permittee shall employ reasonably available control measures on all paved roadways and parking areas 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 paved roadways and parking areas by flushing with water, sweeping, and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.e** The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways 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 unpaved shoulders of all paved roadways 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 permittee shall employ reasonably available control measures on all unpaved roadways and parking areas 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 unpaved roadways and parking areas 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. Additional Terms and Conditions (continued)

- 2.g** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.h** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.i** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.j** 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.k** This rule citation reflects 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 was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the Ohio Electric Utilities have agreed to consider this revised rule as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of these limitations 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 the roadways and parking areas in accordance with the following frequencies:

Paved Roadways and Parking Areas:

All paved roadways and parking areas listed in Section A.I.2.a above.

Minimum Inspection Frequency:

daily

Unpaved Roadways and Parking Areas:

All unpaved roadways and parking areas listed in Section A.I.2.b above.

Minimum Inspection Frequency:

daily

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area 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. 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.

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

3. 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.
4. 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 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, 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 quarterly deviation (excursion) 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 General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

1. Compliance with the emission limitations for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with 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)(d) of OAC rule 3745-17-03.*

*The procedures relating to Test Method 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 the 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

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>
paved roadways and parking areas (see Section A.1.2.a)	none	none
unpaved roadways and parking areas (see Section A.1.2.b)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. 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 PILE (F002)
Activity Description: COAL 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 coal storage piles (see Section A.I.2.a. for identification of coal storage piles)	OAC rule 3745-17-07(B)(7)(b)	20% opacity, as a 3-minute average (see Section A.I.2.h)
operation of vehicles on top of coal storage piles, excluding emissions from the combustion of fuels in such vehicles (i.e., pile working)	OAC rule 3745-17-07(B)(7)(c)	20% opacity, as a 3-minute average (see Section A.I.2.h)
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 period (see Section A.I.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.I.2.e through A.I.2.g)
	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.I.2.b, A.I.2.c and A.I.2.g)
	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.I.2.d, A.I.2.f and A.I.2.g)

2. Additional Terms and Conditions

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

Plant coal storage piles located on the northside of the power plant building.

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 treat the coal load-in and load-out 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.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 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.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 each coal storage pile in accordance with the following frequencies:

Coal Storage Pile Identification:

Plant coal storage piles located on the northside of the power plant building.

Minimum Coal Load-in Inspection Frequency:

daily, when in use

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

Coal Storage Pile Identification:

Plant coal storage piles located on the northside of the power plant building.

Minimum Coal Load-out Inspection Frequency:

daily when in use

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

Coal Storage Pile Identification:

Plant coal storage piles located on the northside of the power plant building.

Minimum Coal Pile Working Inspection Frequency:

daily when in use

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:

Plant coal storage piles located on the northside of the power plant building.

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 quarterly deviation (excursion) 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 General Term and Condition A.1.c.ii 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 Limitation:
20% opacity, as a 3-minute average, for coal load-in, coal load-out, and coal pile working operations.

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.*

- 1.b Emission Limitation:
no visible emissions except for 13 minutes during any 60-minute 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 Appeal 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 U.S. EPA 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 U.S. EPA approval of the procedures as a revision to the Ohio SIP for particulate matter.

Facility Name: **EDGEWATER PLANT**
Facility ID: **02-47-08-0049**
Emissions Unit: **COAL PILE (F002)**

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 coal storage piles (see Section A.1.2.a. for identification of coal storage piles)	none	none
operation of vehicles on top of coal storage piles, excluding emissions from the combustion of fuels in such vehicles (i.e., pile working)	none	none
wind erosion from coal storage piles	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 SYSTEM (F003)
Activity Description: COAL HANDLING 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)	20% opacity, as a 3-minute average
	OAC rule 3745-17-08(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 bottom dumping station

truck dumping station

- 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:

coal conveyors 1 through 5

- 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:

crusher house

2. Additional Terms and Conditions (continued)

- 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:
- crusher house (with conveyors 1, 3 and 4)
 - coal reclaim hopper (with conveyor 1)
 - conveyors 3 and 4 at stacker points
 - conveyor 5 at indoor coal bunker
- 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 bottom dumping station
 - truck dumping station
 - Minimum Inspection Frequency:
 - daily for each station, when in use
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:
 - coal conveyors 1 through 5
 - Minimum Inspection Frequency:
 - daily for each conveyor, when in use

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

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:

crusher house

Minimum Inspection Frequency:

daily, when in use

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:

crusher house (with conveyors 1, 3 and 4)

coal reclaim hopper (with conveyor 1)

conveyors 3 and 4 at stacker points

conveyor 5 at indoor coal bunker

Minimum Inspection Frequency:

daily for each transfer point, when in use

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 quarterly deviation (excursion) reports that identify any of the following occurrences:
- each day during which an inspection was not performed by the required frequency; and
 - each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

IV. Reporting Requirements (continued)

2. The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

1. Compliance with the emission limitations 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

1. **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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: ASH HANDLING EQUIPMENT (F004)

Activity Description: FLY-ASH CONVEYING, STORAGE SILO AND LOADING EQUIPMENT

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>
fly ash and/or bottom ash pneumatic conveying to silos, and fly ash and/or bottom ash silo load-out into trucks and/or railcars	OAC rule 3745-17-07(B)(7)(b)	20% opacity, as a 3-minute average
fly ash and/or bottom ash silo vents (each with baghouse)	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average, except as provided by rule
	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.a through A.I.2.d)

2. Additional Terms and Conditions

- 2.a The permittee shall employ reasonable available control measures on all fly ash and/or bottom ash pneumatic conveying equipment 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 maintaining total enclosure of such equipment to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.b The permittee shall employ reasonable available control measures for operations employing the dumping of fly ash and/or bottom ash from storage silos to trucks 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 apply sufficient water to the fly ash and/or bottom ash during any load-out from storage silos to trucks to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c The permittee shall employ reasonably available control measures for operations employing pneumatic loading of fly ash and/or bottom ash from storage silos to trucks or railcars 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 coaxial spouts or other mechanisms that tightly fit to the tank hatch of the truck or railcar to prevent leaks and vent the displaced air from the tank to the baghouse serving the vent of the storage silo to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d 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. The permittee shall perform daily checks, while the equipment is in operation, for any visible emissions of fugitive dust escaping from any fly ash and/or bottom ash pneumatic conveying system, for any unusual visible emissions from baghouses serving fly ash and/or bottom ash storage silos, and of the effectiveness of the water addition to the fly ash and/or bottom ash during loadout from storage silos into dump trucks to ensure compliance with the above-mentioned applicable requirements during silo loadout. A record of the necessary and completed corrective actions resulting from the daily checks shall be maintained by the permittee.
2. The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned monitoring frequency if operating experience indicates that less frequent monitoring would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified monitoring frequency 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.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports in accordance with General Term and Condition A.1.c.ii of this permit that identify each day that the observations required under the monitoring section of this permit were not performed and each day that any corrective measures required to be taken pursuant to the monitoring section of this permit were not performed.

V. Testing Requirements

1. Compliance with the visible emission limitations identified above shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
20% opacity, as a 3-minute average, for fly ash and/or bottom ash pneumatic conveying to silos and fly ash and/or bottom ash silo load-out into trucks and/or railcars

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*

*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 the 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.

- 1.b Emission Limitation:
20% opacity, as a 6-minute average, except as provided by rule, for fly ash and/or bottom ash silo vents

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

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>
fly ash and/or bottom ash pneumatic conveying to silos, and fly ash and/or bottom ash silo load-out into trucks and/or railcars	none	none
fly ash and/or bottom ash silo vents (each with baghouse)	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 PULVERIZER (P001)

Activity Description: COAL PULVERIZERS AND DRYERS/PULVERIZER MILLS (A-D)

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>
Coal pulverizing, thermal drying and collection process controlled with fabric filters. Includes four 9.0 mmBtu/hr natural gas-fired carrier heaters and four coal pulverizer mills.	40 CFR Part 60, Subpart Y OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(1) OAC rule 3745-31-05 (PTI 02-7466)	The visible particulate and particulate emission limitations from this rule are less stringent than the visible particulate and particulate emission limitations established pursuant to OAC rule 3745-31-05. The visible particulate emission limitations from this rule are less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05. The particulate emission limitation from this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05. Visible particulate emissions from the fabric filter outlets shall not exceed 5% opacity. Particulate emissions shall not exceed 0.006 gr/dscf and 2.6 lbs/hr. Nitrogen oxides emissions shall not exceed 5.05 lbs/hr. Sulfur dioxide emissions shall not exceed 0.02 lb/hr. Organic compound emissions shall not exceed 0.31 lb/hr. Carbon monoxide emissions shall not exceed 3.02 lbs/hr. See Section B.I.2 below.

2. Additional Terms and Conditions

- 2.a The permittee shall only use natural gas as a fuel in this emissions unit.
- 2.b The material handling shall be enclosed and fabric filters shall be employed on all process vents.

II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 - 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall operate and maintain a continuous temperature monitoring device and recorder which measures and records the temperature of the gas stream at the exit of the thermal dryer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring device is to be certified by the manufacturer to be accurate within plus or minus 3 degrees Fahrenheit. The temperature monitoring device shall be recalibrated annually in accordance with the procedures specified in 40 CFR Part 60.13(b).
- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned monitoring frequency if operating experience indicates that less frequent monitoring would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified monitoring frequency 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.

- 3. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

IV. Reporting Requirements

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. **Emission Limitation:**
Visible particulate emissions from the outlet of the fabric filters serving this emissions unit shall not exceed 5% opacity.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

2. **Emission Limitations:**
Particulate emissions shall not exceed 0.006 gr/dscf and 2.6 lbs/hr.

Applicable Compliance Method:

Compliance with these emission limitations may be determined by multiplying the emissions unit's maximum hourly fuel firing rate (.036 mm cu. ft./hr) by an emission factor of 1.9 lbs/mm cu. ft., dividing by the emissions unit's maximum fabric filter flowrate (3494400 dscf/hr), and multiplying by 7000 (conversion from pounds to grains). This 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 these emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

3. **Emission Limitation:**
Nitrogen oxides emissions shall not exceed 5.05 lbs/hr.

Applicable Compliance Method:

Compliance with this emission limitation may be determined by multiplying the emissions unit's maximum hourly fuel firing rate (.036 mm cu. ft./hr) by an emission factor of 100 lbs/mm cu. ft. This 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 (7/98). If required, the permittee shall demonstrate compliance with these emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

4. **Emission Limitation:**
Sulfur dioxide emissions shall not exceed 0.02 lb/hr.

Applicable Compliance Method:

Compliance with this emission limitation may be determined by multiplying the emissions unit's maximum hourly fuel firing rate (.036 mm cu. ft./hr) by an emission factor of 0.6 lb/mm cu. ft. This 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 these emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

5. **Emission Limitation:**
Organic compound emissions shall not exceed 0.31 lb/hr.

Applicable Compliance Method:

Compliance with this emission limitation may be determined by multiplying the emissions unit's maximum hourly fuel firing rate (.036 mm cu. ft./hr) by an emission factor of 5.5 lbs/mm cu. ft. This 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 these emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

6. **Emission Limitation:**
Carbon monoxide emissions shall not exceed 3.02 lbs/hr.

Applicable Compliance Method:

Compliance with this emission limitation may be determined by multiplying the emissions unit's maximum hourly fuel firing rate (.036 mm cu. ft./hr) by an emission factor of 84 lbs/mm cu. ft. This 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 (7/98). If required, the permittee shall demonstrate compliance with these emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Facility Name: **EDGEWATER PLANT**
Facility ID: **02-47-08-0049**
Emissions Unit: **COAL PULVERIZER (P001)**

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>
---	---	--

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: PULVERIZED COAL STORAGE AND TRUCK LOADOUT (P002)
Activity Description: PULVERIZED COAL TRANSFER AND STORAGE BINS

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 storage bins, conveying equipment and two truck load-out stations controlled with fabric filters.	40 CFR Part 60, Subpart Y	The visible particulate emission limitation from this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-17-07(A)	The visible particulate emission limitations from this rule are less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-17-11(B)(1)	The particulate emission limitation from this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05 (PTI 02-7466)	Visible particulate emissions from the outlets of the fabric filters serving this emissions unit shall not exceed 5% opacity. Particulate emissions shall not exceed 0.55 lb/hr. See Section A.I.2 below.

2. Additional Terms and Conditions

- 2.a The pulverized coal material handling shall be enclosed.
- 2.b Fabric filters shall be employed on all storage bin vents and truck load-out vents.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned monitoring frequency if operating experience indicates that less frequent monitoring would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified monitoring frequency 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.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Emission Limitation:
Visible particulate emissions from the outlets of the fabric filters serving this emissions unit shall not exceed 5% opacity.

Applicable Compliance Method:
Compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
2. Emission Limitation:
Particulate emissions shall not exceed 0.55 lb/hr.

Applicable Compliance Method:
Compliance with this emission limitation may be demonstrated by multiplying the fabric filter's guaranteed maximum outlet grain loading (.006 gr/dscf) by the emissions unit's maximum fabric filter flowrate (10500 dscf/hr), and multiplying by 7000 (conversion from pounds to grains). If required, the permittee shall demonstrate compliance with these emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

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>
---	---	--

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

THIS IS THE LAST PAGE OF THE PERMIT
