

Statement of Basis For Title V Permit

Company Name	Piqua Municipal Power Plant	
Premise Number	08-55-10-0041	
Number of Non-insignificant Emissions Units	10	
What makes this facility a Title V facility?	Nitrogen oxide emissions	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
Part II. A.1., page 9	N	Y	Testing requirements for coal fired boilers not currently in operation.
Part II.A.2., page 9	N	Y	Maximum facility wide-emissions for nitrogen oxides and sulfur dioxide.
Part II.A.3., page 9			Record Keeping Requirements (Facility-wide)
Part II. A.4.,page 9			Reporting Requirements (Facility-wide for nitrogen oxides)
Part II.A.5., page 10			Compliance and Testing Requirements for nitrogen oxides (facility wide)

- **Instructions for Part II:**

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

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

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
B007	Visible emissions shall not exceed 20% opacity as a six minute average	17-07(A)	N	Y	Y	Y	Y	Y	N	OR: 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.1. at
	Particulate emissions shall not exceed 0.040 lb/mmBtu actual heat input	17-11(B)(4)	N							
	0.5 pound of sulfur dioxide per million Btu actual heat input	18-61(B)(2)	N							
B008	0.50 lb/mmBtu sulfur dioxides	N	40 CFR part 60 Sub DC	Y	Y	Y	Y	Y	N	<p>OR: The quality of the oil burned in this emissions unit shall meet a sulfur content that sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 lb/mmBtu</p> <p>The permittee shall burn only natural gas, having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet, or number two fuel oil in this emissions unit.</p> <p>Only natural gas or No. 2 fuel oil shall be burned in this emissions unit.</p> <p>The maximum annual natural gas usage for the four boilers (B008, B009, B010, and B011) combined shall not exceed 693 million cubic feet based on a rolling, 12-month summation of the natural gas usage rates.</p> <p>The maximum annual No. 2 oil usage for the four boilers (B008, B009, B010, B011) combined shall not exceed 536,462 gallons, based on a rolling, 12-month summation of the No. 2 Fuel oil usage rates.</p>
	Opacity shall not exceed 20% as a six minute average	17-07(A)(1)	N							
	0.020 pound of particulate emissions per mmBtu actual heat input	17-10(B)(1)	N							
	Only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet, or number two fuel oil in this emissions unit may be burned	18-06(A)	N							
	1.6 lb/mmBtu is less stringent than 0.50 lb/mmBtu	18-06(D)	N							

B008 cont.	0.13 lb/mmBtu NOx when burning natural gas 0.14 lb/mmbtu NOx when burning fuel oil 1.10 TPY particulates 2.76 TPY sulfur dioxides 1.06 lb/hr and 4.16 TPY carbon monoxide 0.07 lb/hr and 0.30 TPY organic compounds opacity shall not exceed 5 percent, as a 6-minute average 7.20 TPY NOx	N	31- 05(A) (3)	Y	Y	Y	Y	Y	N	
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B009	<p>0.50 lb/mmBtu sulfur dioxides, fuel analysis</p> <p>Opacity shall not exceed 20%, as a six minute average</p> <p>0.020 pound of particulate emissions per mmBtu actual heat input</p> <p>Burn only natural gas having a heat content greater than 950 Btu per cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet or #2 fuel oil.</p> <p>Requirement of 1.6 lb/mmBtu sulfur dioxide is less stringent than 0.50 lb/mmBtu</p> <p>0.13 lb/mmBtu NOx when burning natural gas .014 lb/mmBtu NOx when burning #2 fuel oil</p> <p>2.20 TPY PM</p> <p>5.51 TPY sulfur dioxide</p> <p>0.88 lb/hr and 3.85 TPY CO</p> <p>0.14 lb/hr and 0.60 TPY OC</p> <p>14.40 TPY NOx</p> <p>Opacity shall not exceed 5% as a 6 minute average</p>	<p>N</p> <p>17-07(A)(1)</p> <p>17-10(B)(1)</p> <p>18-06(A)</p> <p>18-06(D)</p> <p>N</p>	<p>40 CFR Part 60</p> <p>N</p> <p>N</p> <p>N</p> <p>N</p> <p>31-05(A)(3)</p>	Y	Y	Y	Y	Y	N	<p>OR: The quality of the oil burned in this emission unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.1. above.</p> <p>The permittee shall burn only natural gas, having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet, or number two fuel oil in this emissions unit.</p> <p>Only natural gas or No. 2 fuel oil shall be burned in this emissions unit.</p> <p>The maximum annual natural gas usage for the four boilers (B008, B009, B010, and B011) combined shall not exceed 693 million cubic feet, based on a rolling, 12-month summation of the natural gas usage rates.</p> <p>The maximum annual No. 2 oil usage for the four boilers (B008, B009, B010, B011) combined shall not exceed 536,462 gallons, based on a rolling, 12-month summation of the No. 2 fuel oil usage rates.</p>
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B010	<p>0.50 lb/mmBtu sulfur dioxides, fuel analysis</p> <p>Opacity shall not exceed 20%, as a six minute average</p> <p>0.020 pound of particulate emissions per mmBtu actual heat input</p> <p>Burn only natural gas having a heat content greater than 950 Btu per cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet or #2 fuel oil.</p> <p>Requirement of 1.6 lb/mmBtu sulfur dioxide is less stringent than 0.50 lb/mmBtu</p> <p>0.13 lb/mmBtu NOx when burning natural gas .014 lb/mmBtu NOx when burning #2 fuel oil</p> <p>2.20 TPY PM</p> <p>5.51 TPY sulfur dioxide</p> <p>0.88 lb/hr and 3.85 TPY CO</p> <p>0.14 lb/hr and 0.60 TPY OC</p> <p>14.40 TPY NOx</p> <p>Opacity shall not exceed 5% as a 6 minute average</p>	<p>N</p> <p>17-07(A)(1)</p> <p>17-10(B)(1)</p> <p>18-06(A)</p> <p>18-06(D)</p> <p>N</p>	<p>40 CFR Part 60</p> <p>N</p> <p>N</p> <p>N</p> <p>N</p> <p>31-05(A)(3)</p>	Y	Y	Y	Y	Y	N	<p>OR: The quality of the oil burned in this emission unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.1. above.</p> <p>The permittee shall burn only natural gas, having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet, or number two fuel oil in this emissions unit.</p> <p>Only natural gas or No. 2 fuel oil shall be burned in this emissions unit.</p> <p>The maximum annual natural gas usage for the four boilers (B008, B009, B010, and B011) combined shall not exceed 693 million cubic feet, based on a rolling, 12-month summation of the natural gas usage rates.</p> <p>The maximum annual No. 2 oil usage for the four boilers (B008, B009, B010, B011) combined shall not exceed 536,462 gallons, based on a rolling, 12-month summation of the No. 2 fuel oil usage rates.</p>
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B011	<p>0.50 lb/mmBtu sulfur dioxides, fuel analysis</p> <p>Opacity shall not exceed 20%, as a six minute average</p> <p>0.020 pound of particulate emissions per mmBtu actual heat input</p> <p>Burn only natural gas having a heat content greater than 950 Btu per cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet or #2 fuel oil.</p> <p>Requirement of 1.6 lb/mmBtu sulfur dioxide is less stringent than 0.50 lb/mmBtu</p> <p>0.13 lb/mmBtu NOx when burning natural gas .014 lb/mmBtu NOx when burning #2 fuel oil</p> <p>2.20 TPY PM</p> <p>5.51 TPY sulfur dioxide</p> <p>0.88 lb/hr and 3.85 TPY CO</p> <p>0.14 lb/hr and 0.60 TPY OC</p> <p>14.40 TPY NOx</p> <p>Opacity shall not exceed 5% as a 6 minute average</p>	<p>N</p> <p>17-07(A)(1)</p> <p>17-10(B)(1)</p> <p>18-06(A)</p> <p>18-06(D)</p> <p>N</p>	<p>40 CFR Part 60</p> <p>N</p> <p>N</p> <p>N</p> <p>N</p> <p>31-05(A)(3)</p>	Y	Y	Y	Y	Y	N	<p>OR: The quality of the oil burned in this emission unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.1. above.</p> <p>The permittee shall burn only natural gas, having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet, or number two fuel oil in this emissions unit.</p> <p>Only natural gas or No. 2 fuel oil shall be burned in this emissions unit.</p> <p>The maximum annual natural gas usage for the four boilers (B008, B009, B010, and B011) combined shall not exceed 693 million cubic feet, based on a rolling, 12-month summation of the natural gas usage rates.</p> <p>The maximum annual No. 2 oil usage for the four boilers (B008, B009, B010, B011) combined shall not exceed 536,462 gallons, based on a rolling, 12-month summation of the No. 2 fuel oil usage rates.</p>
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EU = emissions unit id
OR = operational restriction
M = monitoring requirements
R = recordkeeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

- **Instructions for Part III:**

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

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

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

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

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