

TV Annual Compliance Certification 181915
Avon Lake Power Plant
0247030013
April 24, 2019

Ohio EPA, Division of Air Pollution Control
Title V Annual Compliance Certification

Apr 25 2019, 02:00:04

Facility ID: 0247030013
Facility Name Avon Lake Power Plant

Report ID 181915
Report Type TV Annual Compliance
Certification

Reporting Period 2018

Submitted: Yes

Report Status Submitted

Submitted Date: Apr 24, 2019

1. Identification of Intermittent Compliance (IC)

Intermittent compliance may be identified through either the following table or by attaching the information below. When attaching a document in lieu of using the table below, the document must meet the required format and content requirements for annual certifications. You can download a 'Title V Compliance Certification' form that meets these requirements along with instructions and examples from the system's Reference Page. Except as indicated in this section, the Material Information Section below, or any attachments submitted in lieu of using this sections, submittal of this report shall indicate all emissions units subject to one or more applicable requirements operated in continuous compliance with all federally enforceable permit terms and conditions throughout the reporting period identified above.

				Excursions/Deviations (one of the following must be provided)	
IC ID	EU ID	Emission Limitation/Control Measure or Permit Term No.	Compliance Method	Report Date of Those Documented Within Excursion/Deviation Reports Submitted to DO/LAA	Explain the Date, Nature, Duration, and Probable Cause of the Excursion/Deviation, as well as any Corrective Action Taken
No records found					

2. Any Material Information Not Established Through the Applicable Permit Terms and Conditions That May Indicate Non-Compliance

For each peice of material information, identify the emissions unit or briefly describe the requirement and then provide a description of the material information. For insignificant emissions units, include the permit number or SIP-based applicable requirement rule reference. If you are attaching a Title V Compliance Certification form that includes this information you do not need to duplicate it here.

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3. Attachments

If you are attaching any previously submitted reports as part of this submittal, remember to also report the name and the date of the report.

Attachment ID	Attachment Type	Description	Public Document	Trade Seceret Document	Trade secret Justification	Event Date
1854442	Title V Compliance Certification attachments	Avon Lake Title V Compliance Certification	X			



Avon Lake Power Plant
33570 Lake Road
Avon Lake, OH 44012

April 22, 2019

Director
Ohio EPA
c/o NEDO
2110 E. Aurora Road
Twinsburg, OH 44087-1924

Subject: ***NRG Power Midwest - Avon Lake Power Plant
2018 Annual Compliance Certification***

Dear Sir or Madam:

Enclosed please find a copy of the calendar year 2018 Annual Compliance Certification for Avon Lake Power Plant (Facility ID: 02-47-03-0013). This was submitted via the Ohio eBusiness Center on or before April 30, 2019.

If you have any questions, please contact Scott Cameron, Avon Lake Environmental Specialist at (440) 930-6564.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel A. Rogatto".

Daniel A. Rogatto
Plant Manager and Responsible Official
Avon Lake Plant

Title V Compliance Certification

A. Facility Name: Avon Lake Power Plant

B. Facility Address: 33570 Lake Road Avon Lake, OH 44012

C. Facility ID [10 digits]: 02-47-03-0013

D. Final Title V Permit Issuance Date [Multiple dates should be identified if the permit was modified or renewed during the reporting year]:

05/30/2003	03/28/2017			
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E. Reporting Period (usually the preceding calendar year): January 1, 2018 through December 31, 2018

Total pages in this Certification: 4

F. Identification of intermittent compliance [add rows as necessary or indicate in the last row of the table below if attaching an Air Services Compliance Certification print out, or a facility-generated printout that is equivalent to what is detailed in the table below].

*Identify the Emissions Unit and the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Excursions/Deviations	
		Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Probable Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
Boiler #12 (B012) – Permit Condition No. C.2.b.1.b)	Continuous opacity monitor (COM)	All instances of opacity values in excess of the limitations specified in OAC Rule 3745-17-07 - please reference the 1 st Quarter 2018 Quarterly Deviation Report of April 26, 2018	
Boiler #12 (B012) – Permit Condition No. C.2.b.1.b)	Continuous opacity monitor (COM)	All instances of opacity values in excess of the limitations specified in OAC Rule 3745-17-07 - please reference the 2 nd Quarter 2018 Quarterly Deviation Report of July 13, 2018	
Boiler #12 (B012) – Permit Condition No. C.2.b.1.b)	Continuous opacity monitor (COM)	All instances of opacity values in excess of the limitations specified in OAC Rule 3745-17-07 - please reference the 3 rd Quarter 2018 Quarterly Deviation Report of October 15, 2018	
Boiler #12 (B012) – Permit Condition No. C.2.b.1.b)	Continuous opacity monitor (COM)	All instances of opacity values in excess of the limitations specified in OAC Rule 3745-17-07 - please reference the 4 th Quarter 2018 Quarterly Deviation Report of January 15, 2019	
Boiler #12 (B012) – Permit Condition No. C.2.d.2)	Continuous opacity monitor (COM)	COM system downtime when the emissions unit was on-line – please reference the 1 st Quarter 2018 Quarterly Deviation Report of April 26, 2018	

*Identify the Emissions Unit and the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Excursions/Deviations	
		Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Probable Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
Boiler #12 (B012) – Permit Condition No. C.2.d.2)	Continuous opacity monitor (COM)	COM system downtime when the emissions unit was on-line – please reference the 2 nd Quarter 2018 Quarterly Deviation Report of July 13, 2018	
Boiler #12 (B012) – Permit Condition No. C.2.d.2)	Continuous opacity monitor (COM)	COM system downtime when the emissions unit was on-line – please reference the 3 rd Quarter 2018 Quarterly Deviation Report of October 15, 2018	
Boiler #12 (B012) – Permit Condition No. C.2.d.2)	Continuous opacity monitor (COM)	COM system downtime when the emissions unit was on-line – please reference the 4 th Quarter 2018 Quarterly Deviation Report of January 15, 2019	
Boiler #12 (B012) – Permit Condition No. C.2.d.4)	Sulfur dioxide (SO ₂) continuous emissions monitor (CEM)	SO ₂ CEM system downtime when the emissions unit was on-line – please reference the 1 st Quarter 2018 Quarterly Deviation Report of April 26, 2018	
Boiler #12 (B012) – Permit Condition No. C.2.d.4)	Sulfur dioxide (SO ₂) continuous emissions monitor (CEM)	SO ₂ CEM system downtime when the emissions unit was on-line – please reference the 2 nd Quarter 2018 Quarterly Deviation Report of July 13, 2018	
Boiler #12 (B012) – Permit Condition No. C.2.d.4)	Sulfur dioxide (SO ₂) continuous emissions monitor (CEM)	SO ₂ CEM system downtime when the emissions unit was on-line – please reference the 3 rd Quarter 2018 Quarterly Deviation Report of October 15, 2018	
Boiler #12 (B012) – Permit Condition No. C.2.d.4)	Sulfur dioxide (SO ₂) continuous emissions monitor (CEM)	SO ₂ CEM system downtime when the emissions unit was on-line – please reference the 4 th Quarter 2018 Quarterly Deviation Report of January 15, 2019	
Boiler #12 (B012) – Permit Condition No. C.2.d.6)	Nitrogen Oxides (NO _x) continuous emissions monitor (CEM)	NO _x CEM system downtime when the emissions unit was on-line – please reference the 1 st Quarter 2018 Quarterly Deviation Report of April 26, 2018	
Boiler #12 (B012) – Permit Condition No. C.2.d.6)	Nitrogen Oxides (NO _x) continuous emissions monitor (CEM)	NO _x CEM system downtime when the emissions unit was on-line – please reference the 2 nd Quarter 2018 Quarterly Deviation Report of July 13, 2018	

*Identify the Emissions Unit and the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Excursions/Deviations	
		Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Probable Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
Boiler #12 (B012) – Permit Condition No. C.2.d.6)	Nitrogen Oxides (NOx) continuous emissions monitor (CEM)	NOx CEM system downtime when the emissions unit was on-line – please reference the 3 rd Quarter 2018 Quarterly Deviation Report of October 15, 2018	
Boiler #12 (B012) – Permit Condition No. C.2.d.6)	Nitrogen Oxides (NOx) continuous emissions monitor (CEM)	NOx CEM system downtime when the emissions unit was on-line – please reference the 4 th Quarter 2018 Quarterly Deviation Report of January 15, 2019	
Package Boiler #1 (B015) and Package Boiler #2 (B016) – Permit Condition No. C.7.d.2)	Continuous opacity monitor (COM)	COM system downtime when the emissions unit was on-line – please reference the 1st 2018 Quarterly Deviation Report of April 26, 2018	
Package Boiler #1 (B015) and Package Boiler #2 (B016) – Permit Condition No. C.7.d.2)	Continuous opacity monitor (COM)	COM system downtime when the emissions unit was on-line – please reference the 2nd Quarter 2018 Quarterly Deviation Report of July 13, 2018	
Package Boiler #1 (B015) and Package Boiler #2 (B016) – Permit Condition No. C.7.d.2)	Continuous opacity monitor (COM)	COM system downtime when the emissions unit was on-line – please reference the 3rd Quarter 2018 Quarterly Deviation Report of October 15, 2018	
Package Boiler #1 (B015) and Package Boiler #2 (B016) – Permit Condition No. C.7.d.2)	Continuous opacity monitor (COM)	COM system downtime when the emissions unit was on-line – please reference the 4th Quarter 2018 Quarterly Deviation Report of January 15, 2019	
Package Boiler #1 (B015) and Package Boiler #2 (B016) – Permit Condition No. C.7.d.5)	Nitrogen Oxides (NOx) continuous emissions monitor (CEM)	NOx CEM system downtime when the emissions unit was on-line – please reference the 1 st 2018 Quarterly Deviation Report of April 26, 2018	
Package Boiler #1 (B015) and Package Boiler #2 (B016) – Permit Condition No. C.7.d.5)	Nitrogen Oxides (NOx) continuous emissions monitor (CEM)	NOx CEM system downtime when the emissions unit was on-line – please reference the 2 nd Quarter 2018 Quarterly Deviation Report of July 13, 2018	
Package Boiler #1 (B015) and Package Boiler #2 (B016) – Permit Condition No. C.7.d.5)	Nitrogen Oxides (NOx) continuous emissions monitor (CEM)	NOx CEM system downtime when the emissions unit was on-line – please reference the 3 rd Quarter 2018 Quarterly Deviation Report of October 15, 2018	

*Identify the Emissions Unit and the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Excursions/Deviations	
		Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Probable Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
Package Boiler #1 (B015) and Package Boiler #2 (B016) – Permit Condition No. C.7.d.5)	Nitrogen Oxides (NOx) continuous emissions monitor (CEM)	NOx CEM system downtime when the emissions unit was on-line – please reference the 4 th Quarter 2018 Quarterly Deviation Report of January 15, 2019	
Place an “X” in the box to the left if you have attached a facility-generated printout in addition to or lieu of completing the rows above (this information must be uploaded to Air Services, along with this completed Certification).			

*For IEUs, include the permit number or SIP-based applicable requirement rule reference

G. Any material information not established through the applicable permit terms and conditions that may indicate non-compliance [add rows as necessary]:

*Identify the Emissions Unit or briefly describe the requirement	Description of material information
Not applicable	Not applicable

*For IEUs, include the permit number or SIP-based applicable requirement rule reference

H. Certification of Compliance:

Except as indicated in Sections F and G above, all emissions units subject to one or more applicable requirements operated in continuous compliance with all federally enforceable permit terms and conditions throughout the calendar year identified in Section E above.

I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that every permit term and condition, including every permit term and condition or SIP-approved rule reference for each insignificant emissions unit that is based on an applicable requirement, has been reviewed with respect to intermittent or continuous compliance. I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that the facility identified in Sections A through C above was in continuous compliance with every permit term and condition during the reporting period, except as specified in Section F and Section G of this certification. I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that the statements made in this Title V Compliance Certification, **which I am submitting to Ohio EPA via the Ohio EPA's Air Services software on the date indicated in Air Services**, are true, accurate and complete, based on information and belief formed after reasonable inquiry. **My completion of the attestation as part of the PIN process within Air Services also serves as my electronic signature and certification of this Title V Compliance Certification.** But note, in completing the attestation as part of the PIN process within Air Services, I am not attesting that I have personally examined and am familiar with this facility's compliance with every permit term and condition covered by the certification period, I am only attesting that I have personally examined this Compliance Certification and am familiar with the information submitted herein as being true, accurate and complete based on information and belief formed after reasonable inquiry, as the Certification so states.

Note: If confidential or trade secret information is included in this submission, a copy of this Title V Compliance Certification must be submitted (i.e., post marked) to the Administrator of the United States Environmental Protection Agency c/o Director, Air and Radiation Division, U.S. EPA Region 5, 77 W. Jackson Blvd., AE-17J, Chicago, Illinois 60604. If required, it is recommended that this compliance certification be sent by certified mail to U.S. EPA. Otherwise, submission of this Certification via Air Services meets the requirement to submit a copy of the Compliance Certification to U.S. EPA.

Title V Compliance Certification Instructions

- A. The Facility ID ten-digit number can be found on the first page of your final Title V permit.
- B. Date of Title V permit issuance can be found on the first page of your final Title V permit
- C. Reporting Period (usually the preceding calendar year): The initial period that you are required to certify compliance for after you have been issued your initial Title V permit is from the date the permit became effective until the end of December of that same year. You are required to certify compliance for the entire preceding calendar year for succeeding years that you are required to operate under a Title V permit or a subsequent Title V permit application shield.
- D. Identify the effective date of your permit. If your permit was modified or renewed during the calendar year for which this certification is being prepared, please identify the effective date of such modification or renewal as well. When certifying compliance with a term that has changed as a result of a permit modification or renewal, please indicate to which version of the permit the certification pertains.
- E. Identify the calendar year that the report covers.
- F. Review your compliance status with every permit term except those permit terms that do not impose any affirmative compliance obligations on the permittee. Review must include those General Terms and Conditions which impose an affirmative obligation of compliance upon the permittee. Intermittent compliance for IEUs identified in Part II.A must identify the applicable PTI, and PTI permit term or SIP-based rule citation.

Identify each deviation. Please note that deviations of applicable requirements for insignificant emissions units must also be identified in this section. Although this section focuses on identifying only those permit terms and conditions where intermittent compliance occurred during the reporting period, ***it is important for you to review every permit term and condition, including applicable PTI permit terms or SIP-based rules for IEUs, to ensure you properly fill this section out.*** Failure to do so could put you at risk for enforcement or citizen suit under the Act.

The general requirement in Part I. A. 6. of the Title V Permit requiring compliance with “all terms and conditions of this permit” applies only to terms and conditions which are both State and federally enforceable. Intermittent compliance with any State and federally enforceable Term or Condition will also require identifying intermittent compliance with General Term and Condition Part I. A. 6.

When identifying the method used to determine compliance, please identify the actual method used. Most times this will be similar or identical to the method established in the permit. However, some permits provide monitoring flexibility, or intermittent compliance may be discovered via a method other than what is specified in the permit; in each case indicate the actual method.

Note: The information identified in this section may be identified in an attachment to this certification (e.g., information tracked in a spreadsheet) as long as the attachment provides the level of detail required by this section. Simply reference the attachment in the first row of the table.

- G. You are required to consider, identify, and address all available additional material information in your annual compliance certification if it does exist, even if the data obtained from monitoring activities required by the permit indicate compliance. Data that indicate possible intermittent compliance must be reported in this section. **The Compliance Certification requirements in Part I.A of your permit require “Such other facts as the Director of the Ohio EPA may require to determine the compliance status of the source”. Part I.A of the permit also requires that any document submitted based on permit requirements (including the compliance certification) include a certification by the responsible official that the information conveyed in the report (or compliance certification) is true and accurate. If credible information indicating intermittent compliance is known to the responsible official and is based on information other than what is required by the permit, it must be identified in order for the responsible official to comply with the signature certification requirements.**

Ohio EPA does not expect this section will be used very often. However, the following examples of “other material information that may indicate non-compliance” may be useful in understanding the type of information that could be identified in Section G.

Example 1:

A permittee is subject to a lb/hr mass limit for particulate emissions. A one-time stack test is the required compliance method for the mass limit. Method 9 opacity readings at a specified frequency are required as ongoing monitoring as an indicator of compliance. All readings taken by the permittee that are above 20% opacity must be reported. A certified smoke reader from U.S. EPA takes readings in accordance with Method 9 that indicate opacity above 20%. U.S. EPA provides a copy of the completed observation sheets as part of a notice of violation sent to the responsible official at the company. The company is not obligated to report the readings as part of the deviation reporting requirements in the permit. However, the responsible official is obligated to identify the readings in Section G of the compliance certification and report them as indicating intermittent compliance with the visible emission limit in the same way that similar readings would have been submitted by the company via the deviation reports.

In the example provided above, if the readings indicated compliance, the information would not need to be identified in Section G. Likewise, if the reader was not certified to take Method 9 readings, the information could be disregarded and would not be identified in Section G, even if the readings indicated high opacity values.

Example 2:

A permittee is subject to a “No Visible Emissions” limit on a six-minute basis for unpaved roadways and parking areas. The permit includes a control requirement to keep the areas adequately wet. A monitoring requirement to conduct monitoring using Method 22 visible emissions readings is included in the permit. A neighbor to the facility takes 15 minute video that clearly indicates the presence of visible emissions. A copy of the video is provided to the company. The company is not obligated to report the visible emissions as part of the deviation reporting requirements in the permit. However, the responsible official is obligated to identify the presence of visible emissions in Section G of the compliance certification and report them as indicating intermittent compliance with the “No VE” limit in the same way that similar readings would have been submitted by the company via the deviation reports.

When identifying the method used to determine compliance, please identify the actual method used. Most times this will be similar or identical to the monitoring method established in the permit. However, some permits provide monitoring flexibility, or intermittent compliance may be discovered via a method other than what is specified in the permit; in each case indicate the actual method.

Note: The information identified in this section may be identified in an attachment to this certification (e.g., information tracked in a spreadsheet) as long as the attachment provides the

level of detail required by this section. Simply reference the attachment in the first row of the table.

- H. By signing in Section H, you are certifying that all applicable permit terms and conditions have been evaluated and the facility was in compliance with all applicable permit terms and conditions during the reporting period with the exception of the noted deviations in Sections F and G.

General Instructions

This certification must be submitted via Air Services by midnight or if electronic submission is not an option at the filing deadline, post-marked by, the certification deadline identified in your current Title V permit. Your filing deadline can be found in the Standard Terms and Conditions.