



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Anne M. Vogel, Director

12/05/2023

Certified Mail

Mr. Mark Johnson  
General James M. Gavin Power Plant  
7397 N State Route 7  
Cheshire, OH 45620

Facility ID: 0627010056  
Permit Number: P0134437  
County: Gallia

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT  
Permit Type: Minor Permit Modification

Dear Permit Holder:

Enclosed is a final Ohio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter, you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

#### **How to appeal this permit**

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Robert Sprague," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
30 East Broad Street, 4th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and state tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org](http://www.ohioairquality.org)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Ohio EPA document search website here: <https://epa.ohio.gov/help-center/edocument-search/edocument-search>.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southeast District Office as indicated on page one of your permit.

Sincerely,



Robert Hodanbosi  
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Ohio EPA DAPC, Southeast District Office



**FINAL**

**Division of Air Pollution Control  
Title V Permit  
for  
General James M. Gavin Power Plant**

Facility ID:	0627010056
Permit Number:	P0134437
Permit Type:	Minor Permit Modification
Issued:	12/05/2023
Effective:	12/05/2023
Expiration:	05/06/2025





**Division of Air Pollution Control**  
**Title V Permit**  
for  
General James M. Gavin Power Plant

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**Final Title V Permit**  
General James M. Gavin Power Plant  
**Permit Number:** P0134437  
**Facility ID:** 0627010056  
**Effective Date:** 12/05/2023

## Authorization

Facility ID: 0627010056  
Facility Description: Power Generating Plant  
Application Number(s): A0074689  
Permit Number: P0134437  
Permit Description: Title V minor permit modification to incorporate recently-issued permits P0134589, P0134804, P0131910, and P0133844 for a power generating plant.  
Permit Type: Minor Permit Modification  
Issue Date: 12/05/2023  
Effective Date: 12/05/2023  
Expiration Date: 05/06/2025  
Superseded Permit Number: P0131433

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

General James M. Gavin Power Plant  
7397 N. St Rt #7  
Cheshire, OH 45620-0271

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office  
2195 Front St.  
Logan, OH 43138  
(740)385-8501

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southeast District Office. 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, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Entered into the Journal of the Director on:

Anne M. Vogel  
Director

Date: 12/05/2023

## List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	IBR = Incorporation by Reference	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	ID = Identification Number (typically referring to a facility ten-digit ID number)	PM = particulate matter
BACT = Best Available Control Technology	LAER = Lowest Achievable Emission Rate	PM <sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	lb(s)/hr = pound(s) per hour	PM <sub>2.5</sub> = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act (1955, 70, 77, 80)	LDAR = Leak Detection and Repair	ppb = parts per billion
CAAA = Clean Air Act Amendments (1990)	LPG = liquefied petroleum gas/propane	ppm = parts per million
CAM = Compliance Assurance Monitoring	MACT = Maximum Achievable Control Technology	PSD = Prevention of Significant Deterioration
CEM = Continuous Emissions Monitor	MAGLC = Maximum Acceptable Ground Level Concentration	psi = pounds per square inch
CEMS = Continuous Emissions Monitoring System	mg/m <sup>3</sup> = milligrams per cubic meter	psia = pounds per square inch absolute
CFC = chlorofluorocarbon	MM = million	PTE = Potential-to-Emit
CFR = Code of Federal Regulations	MMBtu = million British Thermal Units	PTI = Permit-to-Install
CH <sub>4</sub> = methane	MON = Miscellaneous Organic Chemical Manufacturing NESHAP	PTIO = Permit-to-Install and Operate
CI = compression ignition	MSDS = Material Safety Data Sheet	PTO = Permit-to-Operate
CO = carbon monoxide	MSW = Municipal Solid Waste	PWR = process weight rate
CO <sub>2</sub> = carbon dioxide	NAAQS = National Ambient Air Quality Standard	RACM = Reasonably Available Control Measures
COM = Continuous Opacity Monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	RACT = Reasonably Available Control Technology
DAPC = Division of Air Pollution Control	NG = natural gas	RATA = Relative Accuracy Test Audit
DO/LAA = District Office/Local Air Agency	ng/m <sup>3</sup> = nanograms per cubic meter	RTO = regenerative thermal oxidizer
dscf = dry standard cubic foot	NH <sub>3</sub> = ammonia	SB265 = Senate Bill 265
EAC = Emissions Activity Category	NMHC = non-methane hydrocarbons	scfm = standard cubic feet per minute
eDocs = Electronic Documents Database	NMOC = non-methane organic compound	SI = spark ignition
ERAC = Environmental Review Appeals Commission	NNSR = Nonattainment New Source Review	SIP = State Implementation Plan
ESP = electrostatic precipitator	NO = nitrogen oxide	SM = Synthetic Minor
EU = Emissions Unit	NO <sub>2</sub> = nitrogen dioxide	SO <sub>2</sub> = sulfur dioxide
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NO <sub>x</sub> = nitrogen oxides	SOB = Statement of Basis
FER = Fee Emissions Report	NSPS = New Source Performance Standard	SSMP = Startup, Shutdown and Malfunction Plan
FR = Federal Register	NSR = New Source Review	T & C = Term and Condition
GACT = Generally Achievable Control Technology	NTV = Non-Title V	TDS = total dissolved solids
GHG = greenhouse gases	O&M = Operation and Maintenance	TLV = Threshold Limit Value
gr = grains	O <sub>3</sub> = ozone	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OAC = Ohio Administrative Code	TPH = ton(s) per hour
H <sub>2</sub> S = hydrogen sulfide	OC = organic compound	TPY = ton(s) per year
H <sub>2</sub> SO <sub>4</sub> = sulfuric acid	OEPA = Ohio Environmental Protection Agency	TSP = total suspended particulates
HAP = hazardous air pollutant	ORC = Ohio Revised Code	VE = visible emissions
HCl = hydrochloride	Pb = lead	VMT = vehicle miles traveled
HF = hydrogen fluoride	PBR = Permit-By-Rule	VOC = volatile organic compound
Hg = mercury	PCB = polychlorinated biphenyl	WPP = Work Practice Plan
HON = Synthetic Organic Chemical Manufacturing NESHAP	PE = particulate emissions	µg/m <sup>3</sup> = micrograms per cubic meter
hp = horsepower	PEMS = Predictive Emissions Monitoring System	
HVLP = high volume, low pressure		



**Final Title V Permit**  
General James M. Gavin Power Plant  
**Permit Number:** P0134437  
**Facility ID:** 0627010056  
**Effective Date:** 12/05/2023

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under state law only:
- (1) Standard Term and Condition A. 21., Air Pollution Nuisance
  - (2) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (4) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting for State-Only Requirements
  - (5) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (6) Standard Term and Condition A. 30., Submitting Documents Required by this Permit
- (Authority for term: ORC 3704.036(A))*

**2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) 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) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the

emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Southeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.20, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition

A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Southeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

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

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Southeast District Office unless otherwise specified.

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

### **3. Reporting of Any Exceedance of a Federally Enforceable Emission Limitation or Control Requirement Resulting from Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a

federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

#### **4. Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

#### **5. 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))*

#### **6. 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))*

#### **7. General Requirements**

- a) 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01, OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77-07(A)(7))*

## **8. 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))*

## **9. 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))*

**10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

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

**11. 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 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))*

**12. 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))*

### 13. 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:
  - (1) 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.
  - (2) 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.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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 Ohio EPA DAPC, Southeast District Office 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:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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 Ohio EPA DAPC, Southeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - (1) 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.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and

conditions with which there has been continuous compliance throughout the year are not separately identified.

- b. The permittee's current compliance status.
- c. Whether compliance was continuous or intermittent consistent with A.13.d)(2)a. above.
- d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d)(2)a. above.
- e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

- (3) 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))*

#### **14. 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))*

#### **15. 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 [defined as "Title I modification" in OAC rule 3745-77-01], 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 Ohio EPA DAPC, Southeast District Office 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 Ohio EPA DAPC, Southeast District Office 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))*

## 16. 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))*

## 17. 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 activities and emissions levels” as defined in OAC rule 3745-77-01. 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.
- 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.

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

## 18. 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 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

**20. 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))*

**21. 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))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

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 Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) 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, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

**25. Records Retention Requirements Under State Law Only**

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.

**26. 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.

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

**27. Scheduled Maintenance/Malfunction Reporting for State-Only Requirements**

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 Ohio EPA DAPC, Southeast District Office 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).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southeast District Office must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or



- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

**30. Submitting Documents Required by this Permit**

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Southeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



**Final Title V Permit**  
General James M. Gavin Power Plant  
**Permit Number:** P0134437  
**Facility ID:** 0627010056  
**Effective Date:** 12/05/2023

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The following insignificant emissions units at this facility must comply with all applicable state and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description
P004	Emergency Diesel Fire Pump, Unit 1 (PBR16771 issued 11/22/2013 and 40 CFR Part 63, Subpart ZZZZ)
P005	Emergency Diesel Fire Pump, Unit 2 (PBR16771 issued 11/22/2013 and 40 CFR Part 63, Subpart ZZZZ)
F010	Excavation and loading of CCR material and use of lime when needed for solidification of wet CCR [Bottom Ash Pond Closure Project].

*(Authority for term: OAC rule 3745-77-07(A)(13))*

3. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subparts A and Y, Standards of Performance for Coal Preparation Plants and Processing Plants: F001. The complete NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Ohio EPA Southeast District Office.

*(Authority for term: 40 CFR Part 60, Subpart Y)*

4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters: B001 and B002. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Ohio EPA Southeast District Office.

*(Authority for term: 40 CFR Part 63, Subpart DDDDD)*

5. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and UUUUU, National Emission Standards for Hazardous Air Pollutants from Coal and Oil-fired Electric Utility Steam Generating Units: B003 and B004. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Ohio EPA Southeast District Office.

*(Authority for term: 40 CFR Part 63, Subpart UUUUU)*

6. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subparts A and OOO, Standards of Performance for Nonmetallic Mineral Processing Plants (NSPS): P902. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the



Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting Ohio EPA, Southeast District Office.

*(Authority for term: 40 CFR Part 60, Subpart OOO)*

7. The facility is subject to the applicable requirements specified in OAC rule 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.

*(Authority for term: OAC Chapter 3745-25)*

8. The permittee shall ensure that any emissions unit(s) subject to the Cross-State Air Pollution Rule (CSAPR) complies/comply with the requirements of the Ohio Administrative Code (OAC) Chapter 3745-109, which includes submitting timely permit applications. Although we are actively in the process of revoking OAC chapter 3745-109, this rule will remain effective until U.S. EPA approves the removal of OAC chapter 3745-109 from the Ohio State Implementation Plan (SIP).

*(Authority for term: OAC Chapter 3745-109 and 3745-77-07(A)(5))*

9. Transportation Rule (TR) Trading Program Requirements

- a) The permittee shall comply with all applicable Cross-State Air Pollution Rule (CSAPR) requirements (40 CFR Part 97 Subparts AAAAA – CCCCC and GGGGG) by the compliance date specified in 40 CFR 97 Subparts AAAAA – EEEEE.
- b) The TR subject units, and the unit-specific monitoring provisions at this source, are identified in the following table. These units are subject to the requirements for the TR NO<sub>x</sub> Annual Trading Program, the TR NO<sub>x</sub> Ozone Season Trading Program, and the TR SO<sub>2</sub> Group 1 Trading Program.

Unit ID: B003 Babcock and Wilcox Model UP-102 pulverized coal-fired, dry-bottom boiler having a nominal rated capacity of 11,936 MMBtu/hr and controlled with a selective catalytic reduction (SCR) system, electrostatic precipitator (ESP), and wet flue gas desulfurization (FGD) scrubber					
Unit ID: B004 Babcock and Wilcox Model UP-102 pulverized coal-fired, dry-bottom boiler, having a nominal rated capacity of 11,936 MMBtu/hr and controlled with an SCR system, ESP and wet FGD scrubber					
Parameter	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO <sub>2</sub> monitoring) and 40 CFR part 75, subpart	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E	Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19	EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E



	H (for NO <sub>x</sub> monitoring)				
SO <sub>2</sub>	X				
NO <sub>x</sub>	X				
Heat input					

- c) The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (CSAPR NOX Annual Trading Program), 97.1030 through 97.1035 (CSAPR NOX Ozone Season Group 3 Trading Program) and 97.630 through 97.635 (CSAPR SO2 Group 1 Trading Program), as applicable. The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable CSAPR trading programs.
- d) Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <https://www.epa.gov/airmarkets/monitoring-plans-part-75-sources>.
- e) Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.435 (CSAPR NOx Annual Trading Program), 97.1035 (CSAPR NOx Ozone Season Group 3 Trading Program) and 40 CFR 97.635 (CSAPR SO2 Group 1 Trading Program), as applicable. The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.
- f) Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (CSAPR NOX Annual Trading Program), 97.1030 through 97.1034 (CSAPR NOX Ozone Season Group 3 Trading Program) and 97.630 through 97.634 (CSAPR SO2 Group 1 Trading Program), as applicable must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (CSAPR NOX Annual Trading Program), 97.535 and/or 97.835 and/or 97.1035 (CSAPR NOX Ozone Season Trading Program) and 97.635 (CSAPR SO2 Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on EPA's website at <https://www.epa.gov/airmarkets/part-75-petition-responses>.
- g) The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (CSAPR NOX Annual Trading Program), 97.1030 through 97.1034 (CSAPR NOX Ozone Season Group 3 Trading Program) and 97.630 through 97.634 (CSAPR SO2 Group 1 Trading Program), as applicable and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add to or change this unit's monitoring system description.
- h) CSAPR NOx Annual Trading Program requirements



Designated representative requirements	97.406(a), 97.413-97.418
Emissions monitoring, reporting and recordkeeping requirements	97.406(b), 97.430-97.435
NO <sub>x</sub> emissions requirements	97.406(c)
Title V permit revision requirements	97.406(d)
Additional recordkeeping and reporting requirements	97.406(e)
Liability	97.406(f)
Effect on other authorities	97.406(g)

i) CSAPR NO<sub>x</sub> Ozone Season Group 3 Trading Program Requirements

Designated representative requirements	97.1006(a), 97.1013-97.1018
Emissions monitoring, reporting and recordkeeping requirements	97.1006(b), 97.1030-97.1035
NO <sub>x</sub> emissions requirements	97.1006(c)
Title V permit revision requirements	97.1006(d)
Additional recordkeeping and reporting requirements	97.1006(e)
Liability	97.1006(f)
Effect on other authorities	97.1006(g)

j) CSAPR SO<sub>2</sub> Group 1 Trading Program requirements

Designated representative requirements	97.606(a), 97.613-97.618
Emissions monitoring, reporting and recordkeeping requirements	97.606(b), 97.630-97.635
SO <sub>2</sub> emissions requirements	97.606(c)
Title V permit revision requirements	97.606(d)
Additional recordkeeping and reporting requirements	97.606(e)
Liability	97.606(f)
Effect on other authorities	97.606(g)

*(Authority for terms: 40 CFR Part 97)*



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**Permit Number:** P0134437  
**Facility ID:** 0627010056  
**Effective Date:** 12/05/2023

## **C. Emissions Unit Terms and Conditions**



**1. F001, Coal Handling Operations**

**Operations, Property and/or Equipment Description:**

Coal material handling system modified to handle reduced emissions fuel (REF)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) (PTI P0134804 issued 9/25/2023)	Particulate emissions (PE) shall not exceed 3.30 tons per month averaged over a 12-month rolling period.  Emissions of particulate matter less than 10 microns in diameter (PM <sub>10</sub> ) shall not exceed 1.56 tons per month averaged over a 12-month rolling period.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate matter less than 2.5 microns in diameter (PM <sub>2.5</sub> ) emissions from this air contaminant source since the calculated annual emissions rate is less than 10 tons/year taking into account the voluntary restriction from OAC rule 3745-31-05(E).
c.	OAC rule 3745-31-05(E)	Use of baghouses, bin vents, enclosures and dust suppressants to maintain the control efficiencies identified in the permittee's application; and  PM <sub>2.5</sub> emissions shall not exceed 2.84 tons per year.
d.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity as a six-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)	PE from any stack shall not exceed 40 pounds per hour.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-07(B)(5) and OAC rule 3745-17-08(B)	See b)(2)b. below.
g.	40 CFR Part 60, Subpart Y (40 CFR 60.250-258)  [In accordance with 40 CFR 60.250(d), this emissions unit includes affected facilities (REF material handling operations) at a coal preparation and processing plant modified after May 27, 2009 subject to the emissions limitations/control measures specified in this section.]	The owner or operator must not cause to be discharged into the atmosphere from the affected facility any gases which exhibit 10 percent (%) opacity or greater from the REF material handling system identified in b)(2)a. below as subject to Subpart Y. [40 CFR 60.254(b)(1)]
h.	40 CFR Part 60, Subpart A (40 CFR 60.1-60.19)	General Provisions

(2) Additional Terms and Conditions

- a. The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

Material Handling, Conveying/Transfer Points

North barge unloader bucket to RN  
 Conveyor RN to R1N  
 Conveyor R1N to 12N  
 Conveyor 12N to 24  
 South barge unloader bucket to RS  
 Conveyor RS to 1RS  
 Conveyor 1RS to 2RS  
 Conveyor 2RS to 24  
 Conveyor 24 to 46  
 Conveyor 46 to 67  
 Conveyor 67 to radial stacker  
 Rail car dump to T12  
 Conveyor T12 to T23  
 Conveyor T23 to 64  
 Conveyor 64 to 46  
 Under pile feeders to 7N or 7S  
 Conveyor 7N or 7S to 77N or 77S  
 Conveyor 77N or 77S to 77BN or 77BS  
 Conveyor 77BN or 77BS to crushers  
 Crushers to 78N or 78S  
 Conveyor 78N or 78S to 8A  
 Conveyor 8A to AB  
 Conveyor AB to tripper conveyors



Conveyor 78N or 78S to 89  
Conveyor 89 to 9F  
Conveyor 9F to FD  
Conveyor FD to DC  
Conveyor DC to tripper conveyor

REF Material Handling System (Subject to 40 CFR Part 60, Subpart Y)

Transfer from existing conveyors 77BS or 77BN to short conveyor  
Transfer from short conveyor to crusher feed conveyor  
Transfer from crusher feed conveyor to crushers  
Transfer from crushers to pug mill feed conveyor  
Transfer from pug mill feed conveyor to pug mill  
Transfer from pug mill to product conveyor  
Transfer from product conveyor to existing conveyor 78N or 78S

Additional REF Material Handling System - Additive Handling

Pneumatic transfer from truck to silo  
Transfer from silo to day bin  
Transfer from day bin to screw conveyor  
Transfer from screw conveyor to pug mill

- b. This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit. Pursuant to OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(B).
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping 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 stacks 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 emissions incident; and
    - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

*(Authority for term: OAC rules 3745-17-07(A) and 3745-77-07(C)(1))*

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 60, Subparts A and Y, including the following sections:

60.7(a)	Maintain in a logbook (written or electronic) on-site and make it available upon request containing the information in 40 CFR 60.258(b)(1)-(10) as applicable.
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*(Authority for term: 40 CFR Part 60, Subpart Y)*

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible particulate emissions were observed from the stacks serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subparts A and Y, including the following sections:

60.7(a)	Submit written notifications of the date construction commenced, the actual date of initial startup and the anticipated date for conducting opacity observations (completed)
60.258(c)	Submit the results of the initial performance tests (completed)
60.258(d)	After July 1, 2011, within 60 days after the date of completing each performance evaluation conducted to demonstrate compliance with this subpart, the owner or operator of the affected facility must



	submit the test data to EPA by successfully entering the data electronically into EPA's WebFIRE data base available at <a href="http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main">http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main</a> . For performance tests that cannot be entered into WebFIRE (i.e., Method 9 of appendix A-4 of this part opacity performance tests) the owner or operator of the affected facility must mail a summary copy to United States Environmental Protection Agency; Energy Strategies Group; 109 TW Alexander DR; mail code: D243-01; RTP, NC 27711.
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*(Authority for term: 40 CFR Part 60, Subpart Y)*

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

PE from the REF material handling system shall not exceed 2.05 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the recordkeeping in d)(2).

b. Emissions Limitation:

PE shall not exceed 3.30 tons per month averaged over a 12-month rolling period.

Applicable Compliance Method:

This emissions limitation was developed based on the calculations presented in the permittee's application, in tons per year, using Equation 1 of AP-42 Section 13.2.4 (11/06), divided by 12 months/year.

c. Emissions Limitation:

PM<sub>10</sub> emissions shall not exceed 1.56 tons per month averaged over a 12-month rolling period.

Applicable Compliance Method:

This emissions limitation was developed based on the calculations presented in the permittee's application, in tons per year, using Equation 1 of AP-42 Section 13.2.4 (11/06), divided by 12 months/year.



d. Emissions Limitation:

PM<sub>2.5</sub> emissions shall not exceed 2.84 tons per year.

Applicable Compliance Method:

This emissions limitation was developed based on the calculations presented in the permittee's application, in tons per year, using Equation 1 of AP-42 Section 13.2.4 (11/06).

e. Emissions Limitation:

Visible PE from any stack shall not exceed 20% opacity as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible PE shall be determined according to U.S. EPA Method 9.

f. Emissions Limitation:

PE from any stack shall not exceed 40 pounds per hour.

Applicable Compliance Method:

If required, PE shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g. Emissions Limitation:

The owner or operator must not cause to be discharged into the atmosphere from the REF material handling system any gases which exhibit 10% opacity or greater.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated for by the testing required in f)(2) below.

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

(2) Pursuant to the requirements of 40 CFR Part 60, Subparts A and Y, the permittee shall conduct, or have conducted, emission testing for the REF material handling system as listed in b)(2)a. above in accordance with the requirements listed in f)(2)(a)-(i).

a. The emissions testing shall be conducted to demonstrate compliance with the opacity limit in 40 CFR 60.254(b)(1) in accordance with the requirements of 40 CFR Part 60.255(b).

- b. Pursuant to 40 CFR 60.8 and 60.255(b)(2), an initial performance test shall be conducted performed within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility. Performance testing was completed and demonstrated compliance for the equipment listed in b)(2)a. above on February 18, 2014.
- c. A new performance test must be conducted according to the requirements in 40 CFR 60.255(b)(2)(i)-(iii) as applicable, except as provided in 40 CFR 60.255(f):
  - i. 40 CFR 60.255(b)(2)(i): If any 6-minute average opacity reading in the most recent performance test exceeds half the applicable opacity limit, a new performance test must be conducted within 90 operating days of the date that the previous performance test was required to be completed.
  - ii. 40 CFR 60.255(b)(2)(ii): If all 6-minute average opacity readings in the most recent performance test are equal to or less than half the applicable opacity limit, a new performance test must be conducted within 12 calendar months of the date that the previous performance test was required to be completed.
- d. As an alternative to meeting the requirements of 40 CFR 60.255(b)(2), an owner/operator of an affected facility that commenced construction, reconstruction or modification after April 28, 2008 may elect to comply with the following requirements:
  - i. 40 CFR 60.255(f)(1): Monitor visible emissions from each affected facility according to the requirements in 40 CFR 60.255(f)(1)(i)-(iii); or
  - ii. 40 CFR 60.255(f)(2): Prepare a written site-specific monitoring plan for a digital opacity compliance system for approval by the Administrator or delegated authority meeting the requirements found in 40 CFR 60.255(f)(2).
- e. Pursuant to 40 CFR 60.257(a) and 60.11, the following test method(s), with the exceptions in 40 CFR 60.257(a)(1)(i) and (ii) and the additions in 40 CFR 60.257(a)(2) and (3), shall be employed to demonstrate compliance with the opacity limitation in 40 CFR 60.254(b)(1):

Method 9 of 40 CFR Part 60, Appendix A-4

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- f. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed

the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).
- h. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

*(Authority for term: 40 CFR Part 60, Subpart Y)*

g) Miscellaneous Requirements

- (1) None.



**2. F002, FGD Storage Piles**

**Operations, Property and/or Equipment Description:**

FGD landfill and storage piles, wind erosion, and miscellaneous fugitive emissions

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) (PTI P0131910 issued 5/26/22)	Develop and implement a site-specific work practice plan designed as described in d)(2) below to minimize or eliminate fugitive PE, PM <sub>10</sub> , and PM <sub>2.5</sub> .  See b)(2)a. below.
b.	OAC rules 3745-31-10 through 20	Not applicable pursuant to OAC rule 3745-31-13(F).  See b)(2)b. below.
c.	OAC rules 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

(2) Additional Terms and Conditions

a. The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approves the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee cannot begin using any modified Work Practice Plan until such time as the Southeast District Office approves the revised plan.

- b. In accordance with the permittee's application, the Bottom Ash Pond Closure Project will occur over a maximum of a 24-month period, which meets the definition of a temporary project in Chapter 31. The increases for PE, PM<sub>10</sub> and PM<sub>2.5</sub> emissions will have no impact to Class I areas and no area where an applicable increment is known to be violated. Therefore, the requirements of OAC rule 3745-31-10 through 20 are not applicable pursuant to OAC rule 3745-31-13(F).

c) Operational Restrictions

- (1) The Bottom Ash Pond Closure Project shall be completed within 730 days (2 years) of commencement of the project.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))*

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information:

- a. The date the Bottom Ash Pond Closure Project begins; and
- b. The date the Bottom Ash Pond Closure Project is completed.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (2) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees FGD storage piles. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each potential emissions point serving this emissions unit (i.e., load-in, load-out, wind erosion, etc.) to which the plan applies.
- b. A determination of the frequency that each potential emissions point shall be inspected to determine if additional control measures are needed.
- c. The identification of the recordkeeping form/record that will be used to track the inspection and treatment of the potential emissions points. This form/record should include, at a minimum, the following elements:
  - i. Potential emissions point inspected;
  - ii. Date inspected;
  - iii. Name of employee who either did the inspection or who can verify that the inspection was completed;
  - iv. Result of the inspection (needs treatment or does not need treatment)

- v. A description of why no treatment was needed;
  - vi. Date treated;
  - vii. Name of employee who either treated the potential emissions point or who can verify that the segment was treated;
  - viii. Method used to treat the segment.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approves the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Ohio EPA's Southeast District Office (SEDO) for review and approval. The permittee can begin using the revised Work Practice Plan once the SEDO has approved its use.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of each of the potential emissions points serving this emissions unit (i.e., load-in, load-out, wind erosion, etc.) at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a storage pile that is covered with snow and/or ice or 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.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (4) The permittee shall maintain records of the following information:
- a. The records required to be collected under the Work Practice Plan, and
  - b. The date and reason any element of the Work Practice Plan was not implemented.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

e) Reporting Requirements

- (1) Within 30 days from the final issuance of PTI P0131910, the permittee shall submit their proposed Work Practice Plan to the SEDO. This requirement was satisfied on June 22, 2022.



*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (2) The permittee shall submit quarterly deviation 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.

The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (3) Within 30 days of beginning the Bottom Ash Pond Closure Project, the permittee shall notify Ohio EPA Southeast District Office that the project has commenced.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (4) Within 30 days of completing the Bottom Ash Pond Closure Project, the permittee shall notify Ohio EPA Southeast District Office that the project has been completed and shall include the total duration, in days, of the project (from commencement through completion) in this report.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.

**3. F003, Roadways and Parking**

**Operations, Property and/or Equipment Description:**

Plant and Landfill paved and unpaved roadways and parking areas

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) (PTI P0131910 issued 5/26/22)	Develop and implement a site-specific work practice plan designed as described in d)(2) below to minimize or eliminate fugitive particulate emissions (PE), particulate matter less than 10 microns in diameter (PM <sub>10</sub> ) and particulate matter less than 2.5 microns in diameter (PM <sub>2.5</sub> ).  See b)(2)a. below.
b.	OAC rules 3745-31-10 through 20	Not applicable pursuant to OAC rule 3745-31-13(F).  See b)(2)b. below.
c.	OAC rule 3745-17-07(B)(5)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

(2) Additional Terms and Conditions

a. The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approves the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee cannot begin using any modified



Work Practice Plan until such time as the Southeast District Office approves the revised plan.

- b. In accordance with the permittee's application, the Bottom Ash Pond Closure Project will occur over a maximum of a 24-month period, which meets the definition of a temporary project in Chapter 31. The increases for PE, PM10 and PM2.5 emissions will have no impact to Class I areas and no area where an applicable increment is known to be violated. Therefore, the requirements of OAC rule 3745-31-10 through 20 are not applicable pursuant to OAC rule 3745-31-13(F).

c) Operational Restrictions

- (1) The Bottom Ash Pond Closure Project shall be completed within 730 days (2 years) of commencement of the project.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))*

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information:

- a. The date the Bottom Ash Pond Closure Project begins; and
- b. The date the Bottom Ash Pond Closure Project is completed.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (2) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees paved and unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each segment of roadway or parking area to which the plan applies.
- b. A determination of the frequency that each roadway or parking area segment shall be inspected to determine if additional control measures are needed.
- c. The identification of the recordkeeping form/record that will be used to track the inspection and treatment of the roadways and parking areas. This form/record should include, at a minimum, the following elements:
  - i. Roadway or parking area segment inspected;
  - ii. Date inspected;
  - iii. Name of employee who either did the inspection or who can verify that the inspection was completed;

- iv. Result of the inspection (needs treatment or does not need treatment)
- v. A description of why no treatment was needed;
- vi. Date treated;
- vii. Name of employee who either treated the segment or who can verify that the segment was treated;
- viii. Method used to treat the segment.

d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approves the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Ohio EPA's southeast district Office (SEDO) for review and approval. The permittee can begin using the revised Work Practice Plan once the SEDO has approved its use.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing 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.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (4) The permittee shall maintain records of the following information:
  - a. The records required to be collected under the Work Practice Plan, and
  - b. The date and reason any element of the Work Practice Plan was not implemented.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

e) Reporting Requirements

- (1) Within 30 days from the final issuance of PTI P0131910, the permittee shall submit their proposed Work Practice Plan to the SEDO. This requirement was satisfied on June 22, 2022.



*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (5) The permittee shall submit quarterly deviation 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.

The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (6) Within in 30 days of beginning the Bottom Ash Pond Closure Project, the permittee shall notify Ohio EPA Southeast District Office that the project has commenced.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

- (7) Within in 30 days of completing the Bottom Ash Pond Closure Project, the permittee shall notify Ohio EPA Southeast District Office that the project has been completed and shall include the total duration, in days, of the project (from commencement through completion) in this report.

*(Authority for term: ORC 3704.03(T) and OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))*

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.

**4. P008, SO3 Mitigation System**

**Operations, Property and/or Equipment Description:**

Delivery, storage and material handling of dry material used for SO3 mitigation (formerly F006)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0127427 issued 1/30/2020)	PE from the baghouses serving this emissions unit shall not exceed 0.022 gr/dscf and 5.78 tons per year.  There shall be no visible PE from the stacks associated with this emissions unit.  See b)(2)a.-c. below.
b.	OAC rule 3745-17-11(A)	The emissions limitation established pursuant to this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emissions limitation established pursuant to this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

- Railcar Unloading into Silos
- Silo #1
- Silo #2
- Silo #3
- Truck Loadout
- Transfer from Silo to Day Bin

- b. The permittee shall employ best available control measures on all material handling operations associated with the dry handling system for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to control particulate emissions by utilizing total enclosures and bin vent filters to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
  - c. 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 3745-31-05(A)(3).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping 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 control equipment exhaust 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. the total duration of any visible emission incident; and
    - c. any corrective actions taken to eliminate the visible emissions.

*(Authority for term: OAC rule 3745-77-07(C)(1))*
- e) Reporting Requirements
- (1) The permittee shall identify the following information in the quarterly deviation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
    - a. all days during which any visible PE were observed from the stack serving this emissions unit; and
    - b. any corrective actions taken to eliminate the visible PE.

The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Limitations:

PE from the baghouses serving this emissions unit shall not exceed 0.022 gr/dscf and 5.78 tons per year.

Applicable Compliance Method:

Compliance with the short-term limitation is based on the design specifications in the permittee's November 16, 2006 application.

If required, PE shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the tons per year emissions limitation is demonstrated based on the following calculations:

Railcar Unloading into Silos:

$0.022 \text{ gr/dscf} \times 2,852 \text{ cfm} \times 60 \text{ min/hr} \times 1 \text{ lb/7,000 gr} = 0.53 \text{ pound PE/hour}$   
(controlled)

Truck Loading from Silos:

$0.022 \text{ gr/dscf} \times 600 \text{ cfm} \times 60 \text{ min/hr} \times 1 \text{ lb/7,000 gr} = 0.11 \text{ pound PE/hour}$   
(controlled)

Transfer from Silo to Day Silo:

$0.022 \text{ gr/dscf} \times 2,852 \text{ cfm} \times 60 \text{ min/hr} \times 1 \text{ lb/7,000 gr} = 0.53 \text{ pound PE/hour}$   
(controlled)

Emergency Load-in to Day Silo:

$0.022 \text{ gr/dscf} \times 800 \text{ cfm} \times 60 \text{ min/hr} \times 1 \text{ lb/7,000 gr} = 0.15 \text{ pound PE/hour}$   
(controlled)

Tons particulate emissions/year:

$0.53 + 0.11 + 0.53 + 0.15 = 1.32 \text{ pounds PE/hour}$

$1.32 \text{ pounds PE/hour} \times 8,760 \text{ hours/year} \times 0.0005 = 5.78 \text{ tons /year}$

b. Emissions Limitation:

There shall be no visible PE from the stacks associated with this emissions unit.



Applicable Compliance Method:

If required, visible PE shall be determined according to U.S. EPA Method 9.

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

g) Miscellaneous Requirements

(1) None.

**5. P902, Limestone and Lime Handling Systems**

**Operations, Property and/or Equipment Description:**

Limestone and lime handling and processing for the Units 1 and 2 FGD systems that includes the clamshell barge unloader for limestone and/or lime, a limestone and/or lime receiving hopper, a vacuum unloader for lime, seven belt conveyors, three storage silos, two bucket elevators, three limestone surge hoppers, two screw conveyors, primary and alternate lime crusher and surge tanks, and six lime day bins. The clamshell barge unloader is also used for loading trucks that take the material to limestone storage piles (two piles at 30,000 tons each), material is unloaded from the piles and loaded into the Emergency Lime System (ELS) feed hopper to ELS conveyor 1 to the loading chute/bucket elevator. Except for clamshell unloading, truck loading, storage piles (chemical suppression) and associated material handling (watering), ELS feed hopper and ELS conveyor 1, all equipment is controlled with baghouses with 100% capture and 99% control efficiency; all operations after the limestone surge hoppers are not sources of particulate emissions.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0133844 issued 3/29/2023)	Install and operate baghouses with 100% capture efficiency and 99% control efficiency for PE, PM <sub>10</sub> , and PM <sub>2.5</sub> on the vacuum unloading of lime barges, unload conveyors L1S, L2N, and L12, the north, common, and south storage silos and diverter house, lime crushers (hammermills and surge tanks), and six-day lime silos.  PE from the baghouses serving the new silo discharge conveyors, transfer conveyor, bucket elevators, surge hopper conveyor, and limestone surge hoppers operated as part of the new limestone slurry prep operation shall not exceed 0.010 gr/dscf.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>PE shall not exceed 5.73 tons per year.</p> <p>PM<sub>10</sub> emissions shall not exceed 3.50 tons per year.</p> <p>PM<sub>2.5</sub> emissions shall not exceed 1.81 tons per year.</p> <p>The requirements of this rule include compliance with OAC rule 3745-17-07(A).</p> <p>Visible PE of fugitive dust shall not exceed 20% opacity, as a three-minute average.</p> <p>Best available control measures sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)a.-c. below.</p>
b.	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emissions limitation required pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
d.	OAC rules 3745-17-08(B) and 3745-17-07(B)	See b)(2)d. and e. below.
e.	<p>40 CFR Part 60, Subpart OOO (40 CFR 60.670-60.676)</p> <p>[In accordance with 40 CFR 670(a)(1) and Table 2 and Table 3, this emissions unit includes affected facilities in a fixed nonmetallic mineral processing plant that commenced construction, modification, or reconstruction after April 22, 2008, subject to the emissions limitations/control measures specified in this section.]</p>	<p>Meet a particulate matter limit of 0.032 g/dscm (0.014 gr/dscf) from the baghouse stacks. [40 CFR 60.672(a) and Table 2]</p> <p>Meet an opacity limit of 7 percent for the dry control device on the individual enclosed storage bin. [40 CFR 60.672(f) and Table 2]</p> <p>Meet an opacity limit of 7 percent for fugitive emissions from the following transfer points: ELS feed hopper to the ELS conveyor and ELS conveyor to the bucket elevators or from any other affected facility as defined in 60.670 and 60.671. [40 CFR 60.672(b) and Table 3]</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)f. below.
f.	40 CFR Part 60.1-60.19 (40 CFR 60.670(f))	Table 1 of 40 CFR Part 60, Subpart OOO specifies the provisions of Subpart A of this Part 60 that do not apply to owners and operators of affected facilities subject to this subpart or that apply with certain exceptions. (40 CFR 60.670(f))

(2) Additional Terms and Conditions

- a. Except for the clamshell unloading of barges into the receiving hopper or into truck, storage piles of limestone and associated storage pile material handling operations, the permittee shall vent all PE from this emissions unit to baghouses when the emissions unit is in operation.
- b. The permittee shall employ best available control measures on the clamshell unloading of barges into the receiving hopper and trucks for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee’s permit application, the permittee shall employ partial enclosures on the barge unloading hopper and shall use water sprays when handling limestone to ensure compliance. In accordance with the permittee’s application, when handling lime through the clamshell and receiving hopper, the permittee shall employ partial enclosures on the barge unloading hopper and shall employ a chemical dust suppression system. Nothing in this paragraph shall prohibit the permittee from employing additional control measures to ensure compliance.
- c. The permittee shall employ best available control measures on all ELS material handling and transfer operations and the ELS open storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee’s permit application, the permittee shall employ water sprays for the material handling and transfer operations and chemical stabilizer to control wind erosion from the storage piles to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing additional control measures to ensure compliance.
- d. For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented 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 the operation of the material handling operations until further observation confirms that use of the control measures is unnecessary.



- e. This emissions unit is not located within an area identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- f. The requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit pursuant to OAC rule 3745-17-07(B)(11)(e).
- g. The affected facilities that are covered by this permit and subject to the requirements of 40 CFR Part 60, Subpart OOO, are listed below:

ELS conveyor 1

Silo A discharge conveyor, Silo B discharge conveyor, Transfer conveyor 1 and baghouses BH0LH101FA and BH0LH101FB

Bucket elevator 1 and Bucket elevator 2 and baghouse BH0LH102F

Surge hopper conveyor 1 and baghouse BH0LH106F

Limestone surge hoppers 1, 2, and 3, and and baghouses BH1LH201F, BH2LH201F, and BH3LH201F\*

\*Pursuant to 40 CFR 60.672(f), the limestone surge hopper baghouse controls emissions only from the associated surge hoppers and exhaust through the individual stacks, which meets the definition of storage bin in 40 CFR 60.671. Therefore, the baghouses are exempt from the applicable stack PM concentration limit (and associated performance testing) in Table 2 of 40 CFR Part 60, Subpart OOO, but must meet the applicable stack opacity limit and compliance requirements in Table 2 of 40 CFR Part 60, Subpart OOO.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stacks 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 location and 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

- (2) Except as otherwise provided in this section, for clamshell unloading operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>Material handling operation(s)</u>	<u>Minimum inspection frequency</u>
Clamshell unloading into receiving hopper/truck	Daily when in operation
Load in/out of storage piles	Daily when in operation
Wind erosion from storage piles	Daily

The above-mentioned inspections shall be performed during representative, normal operating conditions.

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

- (3) For clamshell unloading operations, the permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed;
- 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.

The information in d)(3)d. shall be kept separately for each material handling operation, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 60, Subparts A and OOO, including the following sections:

<p>60.674(c), 60.675(b) and Table 2</p>	<p>Conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR Part 60, Appendix A-7) while the baghouse is operating.</p> <p>The test is successful if no visible emissions are observed. If any visible emissions are observed, initiate corrective action within 24 hours to return the baghouse to normal operation.</p> <p>The owner or operator of the affected facility may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to 40 CFR 60.675(b) simultaneously with a Method 22 (40 CFR Part 60, Appendix A-7) to determine what constitutes normal visible emissions from that affected facility's baghouse when it is in compliance with the applicable PM concentration limit in Table 2 of 40 CFR Part 60, Subpart OOO. The revised visible emissions success level must be incorporated into the permit for the affected facility.</p>
<p>60.674(c) and 60.676(b)(1)</p>	<p>Keep a logbook onsite and make hard or electronic copies (whichever is requested) of the logbook available to the Administrator upon request.</p> <p>Record each Method 22 (40 CFR Part 60, Appendix A-7) test, including the date and any corrective actions taken, in the logbook required under 40 CFR 60.676(b).</p>
<p>60.674(b)</p>	<p>For affected facilities that use wet suppression to control emissions, perform monthly periodic inspections to check that water is flowing to discharge spray nozzles in the wet suppression system. Initiate corrective action within 24 hours and complete corrective action as expediently as practical if the water is found to not be flowing properly during an inspection of the water spray nozzles.</p> <p>Record each inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken, in the logbook required under 60.676(b).</p>
<p>60.674(b)(1)</p>	<p>If an affected facility relies on water carryover from upstream water sprays to control fugitive emissions, then that affected facility is exempt from the 5-year repeat testing requirement specified in Table 3 of this subpart provided that the affected facility meets the following criteria:</p>

	<p>(i) The owner or operator of the affected facility conducts periodic inspections of the upstream water spray(s) that are responsible for controlling fugitive emissions from the affected facility. These inspections are conducted according to paragraph (b) of this section and §60.676(b), and</p> <p>(ii) The owner or operator of the affected facility designates which upstream water spray(s) will be periodically inspected at the time of the initial performance test required under §60.11 of this part and §60.675 of this subpart.</p>
60.674(b)(2)	<p>If an affected facility that routinely uses wet suppression water sprays ceases operation of the water sprays or is using a control mechanism to reduce fugitive emissions other than water sprays during the monthly inspection (for example, water from recent rainfall), the logbook entry required under §60.676(b) must specify the control mechanism being used instead of the water sprays.</p>

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart OOO)*

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible PE were observed from the stack serving this emissions unit;
  - b. any corrective actions taken to minimize or eliminate the visible PE;
  - c. 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
  - d. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart OOO, including the following sections:

60.7(a)(3) and 60.676(i)	Submit written notification of the actual date of initial startup within 15 days after startup.
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60.7(a)(6) and 60.8(d) [as amended in 60.675(g)]	Provide at least 30 days prior notice of any performance test.
60.8 and 60.676(f)	Submit written reports of the results of all performance tests.

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart OOO)*

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

Install and operate baghouses for the vacuum unloading of lime barges, unload conveyors L1S, L2N, and L12, the north, common, and south storage silos and diverter house, lime crushers (hammermills and surge tanks), and six-day lime silos with 100% capture efficiency for PE, PM<sub>10</sub>, and PM<sub>2.5</sub>.

PE from the baghouses serving the new silo discharge conveyors, transfer conveyor, bucket elevators, surge hopper conveyor, and limestone surge hoppers operated as part of the new limestone slurry prep operation shall not exceed 0.010 gr/dscf.

Applicable Compliance Method:

For the affected facilities in b)(2)f. above, compliance with the PE limitation shall be demonstrated by the testing requirements in f)(2).

For equipment not listed in b)(2)f. above, compliance with the PE limitation is demonstrated by the design specifications in the permittee's application.

For PM<sub>10</sub> and PM<sub>2.5</sub> emissions limitations, compliance is demonstrated by the calculations presented in the permittee's application.

If required, PE shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". If required, PM<sub>10</sub> and PM<sub>2.5</sub> emissions shall be determined according to test Methods 201/201A, and 202 as set forth in 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitations:

PE shall not exceed 5.73 tons per year.

PM<sub>10</sub> emissions shall not exceed 3.50 tons per year.



PM<sub>2.5</sub> emissions shall not exceed 1.81 tons per year.

Applicable Compliance Method:

Compliance with the annual emissions limitations is demonstrated by the calculations presented in the permittee's application based on Equation 1 of AP-42 Section 13.2.4-4 (11/06) and Ohio RACM Manual, Table 2.18-1 for crushed stone loading to hopper emissions factor, a maximum limestone throughput of 1,576,800 tons per year (2% moisture), a maximum limestone throughput through the ELS portion of this unit of 120,000 TPY (2% moisture), a maximum ELS open storage pile capacity of 60,000 tons, a maximum lime throughput of 131,400 tons per year (0.5% moisture), 100% capture and 99% control efficiency of baghouses a 75%\* control of clamshell unloading emissions for water sprays when handling limestone, 90% control from wet chemical suppressions from storage piles (RACM), 50% control from watering for ELS transfer points and material handling operations (RACM).

\*The permittee is permitted to handle lime in the clamshell unloading process with the use of chemical dust suppression (90% control efficiency) as required in b)(2)b. above. The handling of limestone is the worst-case scenario and therefore used to establish the emissions limitations.

c. Emissions Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

If required, visible PE shall be determined according to U.S. EPA Method 9.

d. Emissions Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

e. Emissions Limitation:

Meet a PM limit of 0.032 g/dscm (0.014 gr/dscf) from the baghouse stacks.

Applicable Compliance Method:

If required, PE shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". If required, PM<sub>10</sub> and PM<sub>2.5</sub> emissions shall be determined according to test Methods 201/201A, and 202 as set forth in 40 CFR



Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Initial emissions testing for the affected facilities was conducted August 12-15, 2019 and September 4, 2019.

f. Emissions Limitation:

Meet an opacity limit of 7 percent from the dry control device on the individual enclosed storage bin.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

Initial emissions testing is required in accordance with f)(2) for the baghouses serving limestone surge hoppers 1, 2, and 3 (BH1LH201F, BH2LH201F, and BH3LH201F).

g. Emissions Limitation:

Meet an opacity limit of 7 percent for fugitive emissions from the following transfer points: ELS feed hopper to the ELS conveyor and ELS conveyor to the bucket elevators or from any other affected facility as defined in 60.670 and 60.671.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the testing requirements in f)(2).

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

(2) The permittee shall conduct, or have conducted, performance testing as required in 40 CFR Part 60, Subpart OOO for this emissions unit in accordance with the following requirements:

- a. Pursuant to 40 CFR 60.672(b), 60.675(c) and 60.11, emissions testing shall be conducted within 60 days after achieving the maximum production rate at which affected facilities will be operated, but not later than 180 days after initial startup of the affected facilities.

Per Table 3 to Subpart OOO of Part 60, a repeat performance test according to 40 CFR 60.11 and 60.675 must be conducted within 5 years from the previous performance test for fugitive emissions from affected facilities without water sprays. Affected facilities controlled by water carryover from upstream water sprays that are inspected according to the requirements in §§60.674(b) and 60.676(b) are exempt from this 5-year repeat testing requirement.

- b. The emissions testing shall be conducted to demonstrate compliance with the visible emission limitation applicable to the ELS conveyor 1 transfer point(s), in accordance with the requirements of 40 CFR 60.675.



- c. Pursuant to 40 CFR 60.675, the following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):  
  
for visible emissions, Method 9 of 40 CFR Part 60, Appendix A.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.
- e. No later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast 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, Southeast District Office's refusal to accept the results of the emissions test(s).
- f. Personnel from the Ohio EPA, Southeast 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.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart OOO)*

- g) Miscellaneous Requirements
  - (1) None.

**6. P903, Fly Ash Handling System**

**Operations, Property and/or Equipment Description:**

Ash handling system (formerly F005)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) c)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0127427 issued 1/30/2020)	PE from the baghouse stacks serving this emissions unit shall not exceed 0.03 gr/dscf.  PE shall not exceed 28.64 tons per year.  There shall be no visible PE from the baghouse stacks associated with this emissions unit.  Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average.  Best available control measures sufficient to minimize or eliminate visible emissions of fugitive dust.  See b)(2)a. below.
b.	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emissions limitation required pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emissions limitation specified by this rule is less stringent than the emissions limitation required pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rules 3745-17-07(B) and 3745-17-08(B)	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-15-06(D)	See c)(1) below.

(2) Additional Terms and Conditions

- a. The permittee shall vent all PE from the storage silos to baghouses and from the pug mills to wet scrubbers when the emissions unit is in operation.
- b. The permittee shall employ best available control measures on the material handling operations not controlled with baghouses or scrubbers for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee’s permit application, the permittee shall use pneumatic conveyances and employ partial enclosures to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing additional control measures to ensure compliance.
- c. For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspections 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 the operation of the material handling operations until further observation confirms that use of the control measures is unnecessary.
- d. This facility is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rule 3745-17-08(B) does not apply to this fugitive emissions unit. Also, this emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B).

c) Operational Restrictions

- (1) The permittee shall comply with the requirements of the Preventative Maintenance and Malfunction Abatement Plan (PMMAP), which was last revised February 7, 2012, for the fly ash storage and silo handling system, and/or any subsequent revisions approved by the Ohio EPA Southeast District Office.

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

d) Monitoring and/or Recordkeeping 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 control equipment exhaust 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. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

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

- (2) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>Material handling operation(s)</u>	<u>Minimum inspection frequency</u>
Conveyor transfer points	Daily when in operation

The above-mentioned inspections shall be performed during representative, normal operating conditions.

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

- (3) For material handling operations, the permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed;
- 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.

The information in d)(3)d. shall be kept separately for each material handling operation, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

e) Reporting Requirements

- (1) The permittee shall identify the following information in the quarterly deviation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
  - a. all days during which any visible PE were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible PE.



The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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

- (2) The permittee shall submit semiannual deviation (excursion) reports that identify the following occurrences:
  - a. Each day during which an inspection was not performed when the emissions unit was in operation; and
  - b. Each day when visible emissions were observed and control measures were not implemented as a result of an inspection.

The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

PE from the baghouse stacks serving this emissions unit shall not exceed 0.03 gr/dscf.

Applicable Compliance Method:

Compliance with the short-term limitation is based on the design specifications in the permittee's April 22, 1992 application.

If required, PE shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

- b. Emissions Limitation:

PE shall not exceed 28.64 tons per year.

Applicable Compliance Method:

Compliance with the tons per year emissions limitation is demonstrated based on the following calculations and the information in the permittee's application:

Stack:



PE (tons per year) = 16,000 cfm x 0.03 gr/dscf x 1 lb/7,000 gr x 60 min/hr x 8,760 hr/yr x 1 ton/2,000 lbs

= 18.02 TPY

Fugitive (truck load-out):

PE (tons per year) = maximum annual throughput of truck loading process, in tons x emissions factor for truck loading, in lb PE/ton x (1-building settling factor) X 1 ton/2,000 pounds

= 10.62 TPY

Where:

300,000 tons = maximum annual throughput of truck loading process;

0.236 lb/ton = uncontrolled particulate emission factor for cement loading from Ohio RACM Table 2.13-2 (8/83); and

70% = building settling factor from Ohio RACM Table 2.4-2 (8/83).

Total PE: 18.02 + 10.62 = 28.64 TPY

c. Emissions Limitation:

There shall be no visible PE from the baghouse stacks associated with this emissions unit.

Applicable Compliance Method:

If required, visible PE shall be determined according to U.S. EPA Method 22.

d. Emissions Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

If required, visible PE shall be determined according to U.S. EPA Method 9

*(Authority for terms: OAC rule 3745-77-07(C)(1))*

g) Miscellaneous Requirements

(1) None.

**7. Emissions Unit Group - Auxiliary Boilers: B001, B002**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B001	Unit 1 Auxiliary Boiler
B002	Unit 2 Auxiliary Boiler

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(D) (PTI P0127427 issued 1/30/2020)  Restriction to qualify as a "limited-use boiler" per 40 CFR, Part 63, Subpart DDDDD.	See c)(1) below.
b.	OAC Chapters 3745-109 and 3745-14	See b)(2)a. below.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/MMBtu of actual heat input.
e.	OAC rule 3745-18-06(D)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 1.6 lbs/MMBtu actual heat input.
f.	OAC rule 3745-110-03	See b)(2)b. below.
g.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 – 63.7575)  [In accordance 40 CFR 63.7485, 63.7490(d) and 63.7499(o), this emissions unit is an existing limited-use boiler subject to the tune-up requirements specified in this section.]	Tune-up requirements [40 CFR 63.7500(c) and Table 3 of 40 CFR Part 63, Subpart DDDDD]  See b)(2)c. below.

h.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 63.16)	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1 – 63.16 apply. (40 CFR 63.7565)
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(2) Additional Terms and Conditions

- a. This emissions unit is a non-electric utility generating unit (non-EGU) NO<sub>x</sub> budget unit and a CAIR NO<sub>x</sub> unit, as defined in OAC Chapter 3745-14 and OAC Chapter 3745-109, respectively. However, the federal Clean Air Interstate Rule (CAIR) adopted by Ohio in OAC Chapter 3745-109 has been vacated and replaced by the federal Cross State Air Pollution Rule (CSAPR), effective January 1, 2015. Only EGU sources are subject to the CSAPR requirements. Large non-EGUs located at this facility previously affected under the CAIR program remain under the requirements of OAC Chapter 3745-14 until Ohio EPA can modify the rule. Therefore, this emissions unit remains subject to the non-EGU NO<sub>x</sub> budget trading program requirements as set forth in OAC Chapter 3745-14.

Due to the CAIR vacatur and replacement by U.S. EPA, there is no longer a trading program for non-EGUs. OAC Chapter 3745-14 provisions that outline the mechanisms and requirements for emission allocations, deduction, transfer, and/or surrender of allowances are obsolete. The permittee shall comply with the NO<sub>x</sub> monitoring and reporting provisions of OAC Chapter 3745-14 for owner/operators of non-EGU NO<sub>x</sub> budget units until such time as OAC Chapter 3745-14 is amended and/or the permittee is notified by Ohio EPA that a replacement program has been adopted by Ohio EPA and approved by U.S. EPA.

- b. This emissions unit is not subject to the requirements of OAC rule 3745-110-03 because it is an existing emissions unit and is not located in one of the counties listed in OAC rule 3745-110-02(A)(1)(b).
- c. The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subparts A and DDDDD, including the following sections:

63.7496(b)	Comply with the requirements of 40 CFR Part 63, Subpart DDDDD for this emissions unit no later than January 31, 2016.
63.7500(c) and 63.7575	This emissions unit is a limited-use boiler and is not subject to the emission limits in Tables 1 and 2 or 11 through 13 to 40 CFR Part 63, Subpart DDDDD, the annual tune-up or the energy assessment requirements in Table 3 to 40 CFR Part 63, Subpart DDDDD, or the operating limits in Table 4 to this subpart.
63.7500(c) and 63.7540(a)	Complete a tune up every five years.

63.7510(e)	Complete the initial tune up of the limited use boiler in accordance with 40 CFR 63.7540(a)(1)(i)-(vi) no later than the compliance date (January 31, 2016).
63.7515(d)	Conduct each 5 year tune up no more than 61 months from the previous tune up.

*(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD)*

c) Operational Restrictions

- (1) The maximum annual heat input for this emissions unit shall not exceed 525,600 MMBtu per year.

*(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1))*

- (2) The permittee shall burn only distillate oil in this emissions unit. The distillate oil shall meet U.S. EPA's specifications for ULSD found in 40 CFR 80.510(c).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following information for this emissions unit on a monthly basis:

- a. the distillate oil usage, in gallons;
- b. the heat input, in MMBtu, calculated based on the heat content analyses as required in d)(2) and the distillate oil gallon usage from d)(1)a. above; and
- c. the rolling, 12-month heat input summation, in MMBtu.

*(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))*

- (2) The permittee shall perform or require the supplier to perform the analyses for heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240), or equivalent methods as approved by the Director.

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

- (3) For each day during which the permittee burns a fuel other than ULSD, the permittee shall maintain a record of the type, per cent sulfur content, and quantity of fuel burned in this emissions unit.

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

- (4) The permittee shall maintain documents provided by the oil supplier for each shipment of distillate oil to demonstrate compliance with the ULSD requirement. These documents

must include the receipt or bill of lading that includes confirmation that the fuel meets the #2 diesel fuel ULSD standard.

*(Authority for term: OAC rules 3745-77-07(C)(1), 3745-18-04(E)(3) and 3745-18-04(I))*

- (5) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 63, Subparts A and DDDDD, including the following sections:

63.7525(k) and 63.7555(a)	Maintain copies of each notification and report submitted, a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10% and fuel use records for the days the boiler was operating.
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*(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD)*

e) Reporting Requirements

- (1) The permittee shall submit annual reports that summarize the annual heat input for this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

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

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than distillate oil any meeting U.S. EPA’s specifications for ULSD was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(f) and 63.7545(e)	Submit a Notification of Compliance Status in accordance with 40 CFR 63.9(h)(2) within 60 days of the compliance date.
63.7540(b), 63.7550 and Table 9	Submit 5-year compliance reports containing the applicable information in 40 CFR 63.7550(c) and Table 9 by January 31. The first 5-year compliance report must cover the period beginning on the compliance date and ending on December 31 within five years after the compliance date. Subsequent 5-year compliance reports must cover the applicable 5-year period from January 1 to December 31.

*(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD)*



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible PE shall be determined according to U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emissions Limitation:

PE shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:

Compliance with the allowable mass emission rate for PE shall be demonstrated by dividing the emissions factor of 2.0 lbs PE/1,000 gallons of oil combusted specified in AP-42 Table 1.3-1 (9/98) by the heat content of the oil (in MMBtu/1,000 gallons) as determined through the fuel analysis required in d)(2) above.

If required, PE shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745 17 03(B)(9). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emissions Limitation:

SO<sub>2</sub> emissions shall not exceed 1.6 lbs/MMBtu actual heat input.

Applicable Compliance Method:

Compliance with the allowable SO<sub>2</sub> emission limitation shall be demonstrated by the recordkeeping in d)(4) above.

If required, SO<sub>2</sub> emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

(1) None.

**8. Emissions Unit Group - Main Boilers: B003, B004**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B003	Unit 1 Main Boiler - Babcock and Wilcox Model UP-102 pulverized coal-fired, dry-bottom boiler, having a nominal rated capacity of 11,936 MMBtu/hr, and controlled with a selective catalytic reduction system (SCR), electrostatic precipitator (ESP), and wet FGD scrubber.
B004	Unit 2 Main Boiler - Babcock and Wilcox Model UP-102 pulverized coal-fired, dry-bottom boiler, having a nominal rated capacity of 11,936 MMBtu/hr, and controlled with a selective catalytic reduction system (SCR), electrostatic precipitator (ESP), and wet FGD scrubber.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(F)  <i>(United States of America and the State of New York, et. al and Ohio Citizen Action et al. v. American Electric Power Service Corp. et al, (S.D. Ohio Case No. 2:99-CV-01182), lodged on October 9, 2007 and entered on December 10, 2007, as amended on April 5, 2010, December 28, 2010, May 14, 2013, and January 23, 2017 (hereinafter "Consent Decree")</i>	Continuous operation of a flue gas desulfurization system (FGD), as verified by Appendix B of the Consent Decree.  Continuous operation of a selective catalytic reduction system (SCR), as verified by Appendix B of the Consent Decree.  See b)(2)a., c)(1)-(2), d)(1)-(2) and e)(1) below.
b.	OAC rule 3745 -31-05(A)(3) (PTI P0127427 issued 1/30/2020)	See b)(2)b. below.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.  See b)(2)c. below.
d.	OAC rule 3745-17-10(C)(1)	PE shall not exceed 0.1 lb/MMBtu of actual heat input.
e.	OAC rule 3745-18-33(D)	SO <sub>2</sub> emissions shall not exceed 7.41 lbs/MMBtu of actual heat input.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 75 and OAC Chapter 3745-103	See b)(2)d.-g. below.
g.	OAC rule 3745-110-03	See b)(2)h. below.
h.	<p>40 CFR Part 63, Subpart UUUUU (40 CFR 63.9980-10042)</p> <p>[In accordance with 40 CFR 63.9980-63.9982 and the definitions in 63.10042, this emissions unit is an existing coal-fired electric utility steam generating unit (EGU), constructed prior to May 3, 2011, subject to the emissions limitations and control measures specified in this section.]</p>	<p>Except as provided under the emissions averaging provisions specified in 40 CFR 63.10009, the permittee shall comply with the following emission limitations:</p> <p>Mercury (Hg) 1.2E0 lb/TBtu or 1.3E-2 lb/GWh.</p> <p><u>Comply with either limit:</u></p> <p>Hydrogen chloride (HCl) 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh; <u>OR</u> SO<sub>2</sub> 2.0E-1 lb/MMBtu or 1.5E0 lb/MWh.</p> <p><u>Comply with one of the following limits:</u></p> <p>1) 0.03 lb/MMBtu PM or 0.30 lb/MWh PM; <u>OR</u></p> <p>2) 5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh of total non-Hg HAP metals; <u>OR</u></p> <p>3) each Individual HAP metal as follows:</p> <p>Antimony (Sb) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;</p> <p>Arsenic (As) 1.1E0 lb/TBtu or 2.0 E-2 lb/GWh;</p> <p>Beryllium (Be) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh;</p> <p>Cadmium (Cd) 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh;</p> <p>Chromium (Cr) 2.8E0 lb/TBtu or 3.0E-2 lb/GWh;</p> <p>Cobalt (Co) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;</p> <p>Lead (Pb) 1.2E0 lb/TBtu or 2.0E-2 lb/GWh;</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Manganese (Mn) 4.0E0 lb/TBtu or 5.0E-2 lb/GWh;  Nickel (Ni) 3.5E0 lb/TBtu or 4.0E-2 lb/GWh; and  Selenium (Se) 5.0E lb/TBtu or 6.0E-2 lb/GWh.  [40 CFR 63.9991 and 40 CFR Part 63, Subpart UUUUU Table 2 (1.)]  See b)(2)i. below.
i.	40 CFR Part 63, Subpart UUUUU (40 CFR 63.1-63.16)	Table 9 to Subpart UUUUU of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart UUUUU of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply. (40 CFR 63.10040)
j.	40 CFR Part 64 (Compliance Assurance Monitoring)	See b)(2)j. below.  Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart UUUUU after the compliance date in that rule.

(2) Additional Terms and Conditions

- a. "Continuously operate" or "continuous operation" means that when an SCR, FGD, DSI, ESP or other NO<sub>x</sub> pollution controls are used at an emissions unit, except during a malfunction, they shall be operated at all times such emissions unit is in operation, consistent with the technological limitations, manufacturers' specifications, and good engineering and maintenance practices for such equipment and the emissions unit so as to minimize emissions to the greatest extent practicable. For this source, the "continuously operate" or "continuous operation" definition applies to the operational restrictions in c)(1) and c)(2), the monitoring and recordkeeping requirements in d)(1) and d)(2) and the reporting requirements in e)(1).
- b. OAC rule 3745-31-05(A)(3) did not apply to the changes to this emissions unit for which PTI 06-3146 was issued on 8/12/1992, based on OAC rule 3745-31-01(SSS)(1)(b).

This permit allowed the installation of one flue gas desulfurization (FGD) scrubber unit on emissions units B003 and B004. A permit to install application was required

to determine whether the air quality impacts associated with the installation of the new FGD unit exceeded the levels outlined in OAC rule 3745-31-01(SSS)(1)(b). Because an environmentally beneficial exemption does not allow installation of a project that exceeds modeling thresholds, the installation of the scrubber required a permit to install.

- c. Except as provided in OAC rules 3745-17-03(D) and (E), for any air contaminant source subject to 40 CFR part 51, appendix P, "Minimum Emission Monitoring Requirements," shall operate and maintain a continuous opacity monitoring system (COMS) for measuring opacity. The COMS shall comply with all specifications outlined in 40 CFR Part 60, appendix B, "Performance Specification 1."

Where the use of a COMS would not provide accurate determinations of opacity as described in Section 6.1 of 40 CFR part 51, appendix P, the permittee may elect to:

- i. request, in writing, permission from the director and the administrator to install, calibrate, certify, maintain and operate a CEMS for measuring particulate emissions in lieu of complying with OAC rule 3745-17-10(C)(1). Upon approval of the use of the CEMS by the director and the administrator, the air contaminant source shall comply with the requirements of OAC rule 3745-17-03(D); or
- ii. request, in writing, approval from the director and the administrator of an alternative monitoring plan for determining compliance with particulate emissions, in lieu of complying with OAC rule 3745-17-10(C)(1). Upon approval of the use of the alternative monitoring plan by the director and the administrator, the air contaminant source shall comply OAC rule 3745-17-03(E).

Within 30 days of approval of an option pursuant to b)(2)c.i. or ii. above, the permittee shall apply for administrative modification of the effective PTI and minor permit modification of this permit to request incorporation of the requirements of OAC rules 3745-17-03(D) or (E).

- d. The permittee is subject to the requirements of OAC Chapter 103 and 40 CFR Parts 72 and 75 concerning acid rain, so 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.
- e. The continuous emission monitoring systems consist of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
- f. The permittee shall maintain a written quality assurance/quality control plan for the continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system), designed to ensure continuous valid and representative

readings of SO<sub>2</sub> (and CO<sub>2</sub> or O<sub>2</sub>) emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

- g. The permittee shall maintain a written quality assurance/quality control plan for the continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system), designed to ensure continuous valid and representative readings of NO<sub>x</sub> (and CO<sub>2</sub> or O<sub>2</sub>) emissions in units of the applicable standard(s). The fuel flow monitor/meter shall be maintained as required in Part 75, Appendix D. Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.



- h. This emissions unit is not subject to the requirements of OAC rule 3745-110-03 because it is an existing emissions unit and is not located in one of the counties listed in OAC rule 3745-110-02(A)(1)(b).
- i. Pursuant to 40 CFR 63.9984, the permittee shall demonstrate compliance with 40 CFR Part 63, Subpart UUUUU no later than April 16, 2015.
- j. Ohio EPA, Southeast District Office has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units B003 and B004. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units to assure compliance with the applicable particulate emission limitation in OAC 3745-17-10(C)(1).

Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart UUUUU, upon the date that emissions units B003 and B004 become subject to this rule.

c) Operational Restrictions

- (1) The permittee shall continuously operate a SCR to control NO<sub>x</sub> emissions from emissions units B003 and B004.

*(Authority for term: OAC rules 3745-31-05(F) and 3745-77-07(C)(1))*

- (2) The permittee shall continuously operate a FGD to control SO<sub>2</sub> emissions from emissions units B003 and B004.

*(Authority for term: OAC rules 3745-31-05(F) and 3745-77-07(C)(1))*

- (3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart UUUUU, including the following sections:

63.9991(a)(1)	Meet the emissions limits and work practice standards in Tables 2 and 3 that apply to your EGU, except as provided in 40 CFR 63.10009.
63.9991(a)(2)	Meet each operating limit in Table 4 that applies to your EGU.
63.9991(b)	The Administrator may approve use of an alternative to the work practice standards in 40 CFR 63.9991 as provided in 40 CFR 63.6(g).
63.9991(c)	You may use the alternate SO <sub>2</sub> limit in Tables 1 and 2 of 40 CFR Part 63, Subpart UUUUU only if your EGU:  (1) has a system using wet or dry flue gas desulfurization technology and an SO <sub>2</sub> continuous emissions monitoring system (CEMS) installed on the EGU; and



	(2) at all times, you operate the wet or dry flue gas desulfurization technology and the SO2 CEMS installed on the EGU consistent with 40 CFR 63.10000(b).
63.10000(a)	The emissions limits and operating limits in 40 CFR Part 63, Subpart UUUUU apply at all times except during periods of startup and shutdown; however, for coal-fired, liquid oil-fired, or solid oil-derived fuel-fired EGUs, you are required to meet the work practice requirements, items 3 and 4, in Table 3 of 40 CFR Part 63, Subpart UUUUU during periods of startup or shutdown.
63.10000(b)	Operate and maintain the affected source, including associated air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions.
63.10000(e)	Perform periodic tune-ups of your EGUs according to 40 CFR 63.10021(e) as part of your demonstration of continuous compliance.
63.10000(l)	Install, certify, operate, maintain, and quality assure each monitoring system necessary for demonstrating compliance with the work practice standards for PM or non-mercury HAP metals during startup periods and shutdown periods on or before the date an EGU is subject to 40 CFR Part 63, Subpart UUUUU.
63.10020(b)	You are required to affect monitoring system repairs in response to monitoring system malfunctions and to return the monitoring system to operation as expeditiously as practicable.
63.10005(e) and (f), 63.10006(i), 63.10021(e) and Table 3 (1.)	<p>Conduct a performance tune-up of your EGU according to 40 CFR 63.10021(e) as part of your initial compliance demonstration.</p> <p>For an existing EGU without a neural network, a tune-up, following the procedures in 40 CFR 63.10021(e), must occur within 6 months (180 days) after April 16, 2015. For an existing EGU with a neural network, a tune-up must occur within 18 months (545 days) after April 16, 2016.</p> <p>Conduct a tune-up of the EGU burner and combustion controls at least each 36 calendar months, or each 48 calendar months if neural network combustion optimization software is employed, as specified in 40 CFR 63.10021(e).</p>
63.10005(j), 63.10011(g), 63.10021(h) and Table 3 (3. and 4.)	Follow the requirements given in Table 3 of 40 CFR Part 63, Subpart UUUUU for startup and shutdown of coal-fired units.

*(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart UUUUU)*

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall record the duration of any period during which the FGD did not continuously operate, including the specific dates and times that the FGD did not operate, the reason why permittee did not continuously operate the FGD, and the measures taken to reduce emissions of SO<sub>2</sub> controlled by the FGD.

*(Authority for term: OAC rules 3745-31-05(F) and 3745-77-07(C)(1))*

- (2) The permittee shall record the duration of any period during which the SCR did not continuously operate, including the specific dates and times that the SCR did not operate, the reason why permittee did not continuously operate the SCR, and the measures taken to reduce emissions of NO<sub>x</sub> controlled by the SCR.

*(Authority for term: OAC rules 3745-31-05(F) and 3745-77-07(C)(1))*

- (3) If coal sampling and analysis is used to demonstrate compliance with the SO<sub>2</sub> emission limitation, the permittee shall maintain records for each day of the total quantity of coal burned, the results of the analyses for ash content, and the calculated SO<sub>2</sub> emission rate (lb/MMBtu), and the rolling 30-day weighted SO<sub>2</sub> emission rate (lb/MMBtu) in accordance with the following:

- a. 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 ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal.
- b. 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 to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

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

- (4) To obtain an exemption from the visible emissions limitations specified in OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor(s) and recorder(s) that measure and record the temperature of the boiler exhaust gases entering the ESP:

- a. during all periods of start-up until the ESPs are operational or until the inlet temperature of the ESPs achieve a temperature of two hundred fifty (250) degrees Fahrenheit; and
- b. during all periods of shutdown until the inlet temperature of the ESPs drop below the temperature of two hundred fifty (250) degrees Fahrenheit. An electronic or hardcopy record of the temperature during periods of start-up and shutdown shall be maintained.

The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

*(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A))*

- (5) To the extent applicable, the permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The applicable letter(s)/document(s) of certification under Part 60 and—certification or recommendation for certification under Part 75 shall be made available to the Director (Ohio EPA, Southeast District Office) upon request.

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix B and 40 CFR Part 75)*

- (6) The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> emissions and CO<sub>2</sub> or O<sub>2</sub> emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) including, but not limited to:

- a. emissions of SO<sub>2</sub> in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of SO<sub>2</sub> in units of the applicable standard(s) in the appropriate averaging period;
- c. the percent CO<sub>2</sub> or O<sub>2</sub> with each cycle time of the analyzer, with no resolution less than one data point per minute required;
- d. results of quarterly cylinder gas audits or linearity checks;
- e. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

- f. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- g. hours of operation of the emissions unit, continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system), and control equipment;
- h. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system);
- i. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system); as well as,
- j. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

*(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(F), 40 CFR Part 60, Appendices B and F, 40 CFR Part 75)*

- (7) The permittee may operate and maintain equipment to continuously monitor and record the fuel flow rate in order to stoichiometrically calculate emissions of SO<sub>2</sub>, in pounds per hour, as an alternative to conducting Specification 6. Fuel heat content values for each fuel burned, as applied in the stoichiometric calculations, shall also be recorded. The permittee shall maintain records of data obtained by the fuel flow monitor/meter, including the dates and results of each calibration check and the magnitude of calibration adjustments; periods of downtime and malfunction of the fuel flow monitor/meter; as well as, the reason (if known) and the corrective actions taken (if any) for each such event.

*(Authority for term: 40 CFR Part 75)*

- (8) To the extent applicable, the permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 3; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The applicable letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (Ohio EPA, Southeast District Office) upon request.

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendix B and 40 CFR Part 75)*

- (9) The permittee shall operate and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) including, but not limited to:

- a. emissions of NO<sub>x</sub> in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of NO<sub>x</sub> in units of the applicable standard(s) in the appropriate averaging period;
- c. the percent CO<sub>2</sub> or O<sub>2</sub> with each cycle time of the analyzer, with no resolution less than one data point per minute required;
- d. results of quarterly cylinder gas audits or linearity checks;
- e. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- f. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- g. hours of operation of the emissions unit, continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system), and control equipment;
- h. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system);
- i. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system); as well as,
- j. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendices B & F and 40 CFR Part 75)*

- (10) The permittee may operate and maintain equipment to continuously monitor and record the fuel flow rate in order to stoichiometrically calculate emissions of NO<sub>x</sub>, in pounds per hour, as an alternative to conducting Specification 6. Fuel heat content values for each

fuel burned, as applied in the stoichiometric calculations, shall also be recorded. The permittee shall maintain records of data obtained by the fuel flow monitor/meter, including the dates and results of each calibration check and the magnitude of calibration adjustments; periods of downtime and malfunction of the fuel flow monitor/meter; as well as, the reason (if known) and the corrective actions taken (if any) for each such event.

*(Authority for term: 40 CFR Part 75)*

- (11) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subparts A and UUUUU, including the following sections:

63.10000(d)	Develop a site-specific monitoring plan and submit this site-specific monitoring plan, if requested, at least 60 days before your initial performance evaluation (where applicable) of your continuous monitoring system (CMS) if you demonstrate compliance with any applicable emissions limit through use of a CMS, where a CMS includes a continuous parameter monitoring system (CPMS) as well as a continuous emissions monitoring system (CEMS). The monitoring plan must address the provisions in 40 CFR 63.10000(d)(2)-(5).
63.10000(l), 63.10005(j), 63.10021(h) and Table 3	Collect, record, report, and maintain data obtained from the monitoring systems during startup periods and shutdown periods.
63.10009(j)	Develop an implementation plan for emissions averaging according to the following procedures and requirements in 40 CFR 63.10009(j)(1) and (2).
63.10010(a)-(j)	Monitoring, installation, operation and maintenance requirements for CEMS and CPMS.
63.10020(a)	Monitor and collect data according to 40 CFR 63.10020 and the site-specific monitoring plan required by 40 CFR 63.10000(d).
63.10020(b)	Operate the monitoring system and collect data at all required intervals at all times that the affected EGU is operating, except for periods of monitoring system malfunctions or out-of-control periods (see 40 CFR 63.8(c)(7)) and required monitoring system quality assurance or quality control activities, including, as applicable, calibration checks and required zero and span adjustments.
63.10020(e)	Additional monitoring requirements during startup periods or shutdown periods if you choose to rely on the definition of "startup" in paragraph (2) of 40 CFR 63.10042 for your EGU.



63.10032(a)	Keep records according to 40 CFR 63.10032(a)(1) and (2).
63.10032(b)	Keep records for CEMS and CPMS according to 40 CFR 63.10032(b)(1)-(4).
63.10032(c)	Keep the records required in Table 7 of 40 CFR Part 63, Subpart UUUUU including records of all monitoring data and calculated averages for applicable PM CPMS operating limits to show continuous compliance with each emission limit and operating limit that applies to you.
63.10032(d)	Keep the records in 40 CFR 63.10032(d)(1)-(3) for each EGU subject to an emission limit.
63.10032(e)	If you elect to average emissions consistent with 40 CFR 63.10009, you must additionally keep a copy of the emissions averaging implementation plan required in 40 CFR 63.10009(g), all calculations required under 40 CFR 63.10009, including daily records of heat input or steam generation, as applicable, and monitoring records consistent with 40 CFR 63.10022.
63.10032(f) and (i)	<p>Regarding startup periods or shutdown periods:</p> <p>(1) Should you choose to rely on paragraph (1) of the definition of “startup” in 40 CFR 63.10042 for your EGU, keep records of the occurrence and duration of each startup or shutdown.</p> <p>(2) Should you choose to rely on paragraph (2) of the definition of “startup” in 40 CFR 63.10042 for your EGU, you must keep records of:</p> <ul style="list-style-type: none"> <li>(i) The determination of the maximum possible clean fuel capacity for each EGU;</li> <li>(ii) The determination of the maximum possible hourly clean fuel heat input and of the hourly clean fuel heat input for each EGU; and</li> <li>(iii) The information required in 40 CFR 63.10020(e).</li> </ul> <p>Keep records of the type(s) and amount(s) of fuel used during each startup or shutdown.</p>
63.10032(g)	Keep records of the occurrence and duration of each malfunction of an operation (i.e., process equipment) or the air pollution control and monitoring equipment.
63.10032(h)	Keep records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.10000(b),



	including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
63.10(b)(1) and 63.10033	<p>Your records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1).</p> <p>As specified in 40 CFR 63.10(b)(1), keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.</p> <p>Keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). You can keep the records off site for the remaining 3 years.</p>

*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

e) Reporting Requirements

- (1) The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting any period during which the SCR or the FGD did not continuously operate, including the specific dates and times that such pollution control did not operate, the reason why permittee did not continuously operate such pollution control, and the measures taken to reduce emissions of the pollutant controlled by such pollution control.

*(Authority for term: OAC rules 3745-31-05(F) and 3745-77-07(C)(1))*

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system):
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of SO<sub>2</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Part 75, OAC Chapter 3745-18, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
  - b. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA

Southeast District Office, documenting all instances of continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system downtime and malfunction while the emissions unit was on line.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

- i. the facility name and address;
- ii. the manufacturer and model number of the continuous SO<sub>2</sub> and CO<sub>2</sub> or O<sub>2</sub> and other associated monitors;
- iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
- iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
- v. the total SO<sub>2</sub> emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits or linearity checks;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous SO<sub>2</sub> and CO<sub>2</sub> or O<sub>2</sub> monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\*\* of the continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system), emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime\*\* of the continuous SO<sub>2</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short-term limit in OAC 3745-18-33(D).

\* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

\*\* each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit

*(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60.7 and 40 CFR Part 75)*

- (3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system):
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to Ohio EPA, Southeast District Office, documenting all instances of NO<sub>x</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Parts 75 and 76, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
  - b. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office, documenting all instances of continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system downtime and malfunction while the emissions unit was on line.
  - c. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous NO<sub>x</sub> and CO<sub>2</sub> or O<sub>2</sub> and other associated monitors;
    - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

- iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
- v. the total NO<sub>x</sub> emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits or linearity checks;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO<sub>x</sub> and CO<sub>2</sub> or O<sub>2</sub> monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\*\* of the continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system), emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime\*\* of the continuous NO<sub>x</sub> monitoring system (including the associated continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system) and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

\* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

\*\* each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit

*(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(F) and 40 CFR Part 75)*

- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subparts A and UUUUU, including the following sections:



63.9984 and 63.10030(a)	Meet the notification requirements in 40 CFR 63.10030 according to the schedule in 40 CFR 63.10030 and in 40 CFR Part 63, Subpart A.
63.9(b)(2) and 63.10030(b)	Submit an Initial Notification not later than 120 days after April 16, 2012.
63.10030(d)	Submit a Notification of Intent to conduct a performance test at least 30 days before the performance test is scheduled to begin.
63.10005(k), 63.10011(e) and 63.10030(e)	Submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii) summarizing the results of your initial compliance demonstration. The Notification of Compliance Status report must contain all the information specified in 40 CFR 63.10030(e)(1)-(8), as applicable.
63.10021(h)(3) and (i)	Provide reports and report the information as specified in 40 CFR 63.10031 concerning activities and periods of startup and shutdown.
63.10031(a)-(c) and Table 8	Submit each semiannual report in Table 8 to 40 CFR Part 63, Subpart UUUUU that applies to you by the date in Table 8 according to the requirements in 40 CFR 63.10031(b)(1)-(5) and containing the information required in 40 CFR 63.10031(c)(1)-(9).
63.10031(d)	Include the information required in 40 CFR 63.10(e)(3)(v) in the compliance report specified in 40 CFR 63.10031(c) for each excess emission occurring at an affected source where you are using a CMS to comply with that emission limit or operating limit.
63.10031(e)	Report all deviations as defined in 40 CFR Part 63, Subpart UUUUU in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A).
63.10031(f)	Submit the performance test reports required by 40 CFR 63.10031(f) to the EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX) ( <a href="http://www.epa.gov/cdx">www.epa.gov/cdx</a> ). You must also submit these reports, including the confidential business information, to the delegated authority in the format specified by the delegated authority.
63.10031(g)	The compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded if you had a malfunction during the reporting period.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

See b)(2)c. above.

b. Emissions Limitation:

PE shall not exceed 0.1 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with the lb/MMBtu emissions limitation was demonstrated by performance testing required in PTI 06-3146 issued August 12, 1992.

Ongoing compliance with the PE limitation shall also be demonstrated based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A. PE testing performed to demonstrate compliance in accordance with the requirements of 40 CFR UUUUU shall be deemed acceptable to fulfill this testing requirement. See f)(2) below.

c. Emissions Limitation:

SO<sub>2</sub> emissions shall not exceed 7.41 lbs/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with the emissions limitation shall be demonstrated by the recordkeeping in d)(3) or d)(6) above.

If required, SO<sub>2</sub> emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

d. Emissions Limitations:

Hg 1.2E0 lb/TBtu or 1.3E-2 lb/GWh.

Comply with either limit:



HCl 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh; OR SO<sub>2</sub> 2.0E-1 lb/MMBtu or 1.5E0 lb/MWh.

Comply with one of the following limits:

- 1) 0.03 lb/MMBtu PE or 0.30 lb/MWh PE; OR
- 2) 5.0E-5 lb/MMBtu or 5.0E-1 lb/GWh of Total non-Hg HAP metals; OR
- 3) each Individual HAP metal as follows:

- Antimony (Sb) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;
- Arsenic (As) 1.1E0 lb/TBtu or 2.0 E-2 lb/GWh;
- Beryllium (Be) 2.0E-1 lb/TBtu or 2.0E-3 lb/GWh;
- Cadmium (Cd) 3.0E-1 lb/TBtu or 3.0E-3 lb/GWh;
- Chromium (Cr) 2.8E0 lb/TBtu or 3.0E-2 lb/GWh;
- Cobalt (Co) 8.0E-1 lb/TBtu or 8.0E-3 lb/GWh;
- Lead (Pb) 1.2E0 lb/TBtu or 2.0E-2 lb/GWh;
- Manganese (Mn) 4.0E0 lb/TBtu or 5.0E-2 lb/GWh;
- Nickel (Ni) 3.5E0 lb/TBtu or 4.0E-2 lb/GWh; and
- Selenium (Se) 5.0E lb/TBtu or 6.0E-2 lb/GWh.

Applicable Compliance Method:

Compliance with the applicable limit(s) shall be demonstrated in accordance with the requirements of 40 CFR Part 63, Subpart UUUUU. See f)(3) below.

*(Authority for terms: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

- (2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subparts A and UUUUU, including the following sections:

63.10000(c)	Initial performance testing is required for all pollutants to demonstrate compliance with the applicable emission limits.
63.10000(c)(1)(i) and 63.10005(h)	You may conduct initial performance testing in accordance with 40 CFR 63.10005(h) to determine whether the EGU qualifies as a low emitting EGU (LEE) for one or more applicable emission limits, except as otherwise provided in 40 CFR 63.10000(c)(1)(i)(A)-(B).

	<p>You may pursue the LEE option provided that:</p> <p>(1) Your EGU's control device bypass emissions are measured in the bypass stack or duct or your control device bypass exhaust is routed through the EGU main stack so that emissions are measured during the bypass event; or</p> <p>(2) You bypass your EGU control device only during emergency periods for no more than a total of 2 percent of your EGU's annual operating hours; you use clean fuels to the maximum extent possible during an emergency period; and you prepare and submit a report describing the emergency event, its cause, corrective action taken, and estimates of emissions released during the emergency event.</p>
63.10000(c)(1)(ii)	Conduct a 30-day performance test using Method 30B at least once every 12 calendar months to demonstrate continued LEE status for a qualifying LEE for Hg emissions limits.
63.10000(c)(1)(iii)	Conduct a performance test at least once every 36 calendar months to demonstrate continued LEE status for a qualifying LEE of any other applicable emissions limits.
63.10000(c)(1)(iv)	Demonstrate compliance through an initial performance test and monitor continuous performance through either use of a particulate matter continuous parametric monitoring system (PM CPMS), a PM CEMS, or, for an existing EGU, compliance performance testing repeated quarterly if your coal-fired EGU does not qualify as a LEE for total non-mercury HAP metals, individual non-mercury HAP metals, or filterable particulate PM.
63.10000(c)(1)(v)	You may demonstrate initial and continuous compliance through use of an HCl CEMS, installed and operated in accordance with Appendix B to this subpart. As an alternative to HCl CEMS, you may demonstrate initial and continuous compliance by conducting an initial and periodic quarterly performance stack test for HCl if your coal-fired EGU does not qualify as a LEE for HCl.
63.10000(c)(1)(vi) and Appendix A	Demonstrate initial and continuous compliance through use of a Hg CEMS or a sorbent trap monitoring system, in accordance with 40 CFR Part 63, Subpart UUUUU, Appendix A if your coal-fired EGU does not qualify as a LEE for Hg.
63.10005(a) and 63.10011(a)	Demonstrate initial compliance with each applicable emissions limit in 40 CFR Part 63, Subpart UUUUU Table 1 or 2 through performance testing for each of your affected EGUs.



	Demonstrate initial compliance no later than the date in 40 CFR 63.10005(f) for tune-up work practices for existing EGUs and the date that compliance must be demonstrated, as given in 40 CFR 63.9984 for other requirements for existing EGUs.
63.10005(b), 63.10007 and Table 5	If you choose to use performance testing to demonstrate initial compliance with the applicable emissions limits in 40 CFR Part 63, Subpart UUUUU Table 2 for your EGUs, you must conduct the tests according to 40 CFR 63.10007 and 40 CFR Part 63, Subpart UUUUU Table 5.
63.10005(d)	If, for a particular emission or operating limit, you are required to (or elect to) demonstrate initial compliance using a continuous monitoring system, the CMS must pass a performance evaluation prior to the initial compliance demonstration.
63.10005(h)	For low emitting EGUs, the provisions of 40 CFR 63.10005(h) apply to all pollutants with emissions limits from existing EGUs.
63.10006(a) and Table 5	Conduct all applicable performance tests according to Table 5 of 40 CFR Part 63, Subpart UUUUU and 40 CFR 63.10007 at least every year.
63.10006(d)	Conduct all applicable periodic HCl emissions tests according to Table 5 of 40 CFR Part 63, Subpart UUUUU and 40 CFR 63.10007 at least quarterly, except as otherwise provided in 40 CFR 63.10021(d)(1) for coal-fired EGUs that do not use either an HCl CEMS to monitor compliance with the HCl limit or an SO <sub>2</sub> CEMS to monitor compliance with the alternate equivalent SO <sub>2</sub> emission limit.
63.10006(f)	Complete performance tests for your EGU following the timing requirements in 40 CFR 63.10006(f)(1)-(3).
63.10007(a)	Except as otherwise provided in 40 CFR 63.10007, conduct all required performance tests according to 40 CFR 63.7(d), (e), (f) and (h).  Develop a site-specific test plan according to the requirements in 40 CFR 63.7(c).
63.10007(b)	Conduct each performance test according to the requirements in Table 5 of 40 CFR Part 63, Subpart UUUUU.
63.10009 and 63.10022	Emissions averaging provisions and compliance demonstration requirements
63.10021	Demonstrate continuous compliance with each emissions limit, operating limit, and work practice standard in Tables 1 through



	4 of 40 CFR Part 63, Subpart UUUUU that applies to you, according to the monitoring specified in Tables 6 and 7 of 40 CFR Part 63, Subpart UUUUU and 40 CFR 63.10021(b)-(g).
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*(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart UUUUU)*

g) Miscellaneous Requirements

- (1) Any amendment to 40 CFR Part 63 Subpart UUUUU shall supersede the compliance limitations and/or options contained in this permit.



**9. Emissions Unit Group - Natural Draft Cooling Towers: P006, P007**

EU ID	Operations, Property and/or Equipment Description
P006	600,000 gpm recirculation rate natural draft cooling tower
P007	600,000 gpm recirculating rate natural draft cooling tower

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	See b)(2)a. below.
b.	OAC rule 3745-17-07(A)	See b)(2)b. below.

(2) Additional Terms and Conditions

a. This emissions unit is not subject to the “restrictions on particulate emissions from industrial processes” contained in OAC rule 3745-17-11. Particulate matter emitted from the cooling tower is not measurable by applicable test methods in 40 CFR Part 60, Appendix A and therefore the emissions of particulate matter do not meet the definition of “particulate emissions” in OAC rule 3745-17-01.

b. This emissions unit is exempt from the visible emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.



**Final Title V Permit**  
General James M. Gavin Power Plant  
**Permit Number:** P0134437  
**Facility ID:** 0627010056  
**Effective Date:** 12/05/2023

- f) Testing Requirements
  - (1) None.
- g) Miscellaneous Requirements
  - (1) None.