



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUL 23 2015

REPLY TO THE ATTENTION OF:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Title V renewal permit, permit number P0089258, for the General James M. Gavin Power Plant, located in Cheshire, Ohio. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. Neither the Statement of Basis nor the draft permit mention the 2007 consent decree for AEP which includes the Gavin power plant. The consent decree includes the requirement for Gavin to continuously operate the selective catalytic reduction and the flue gas desulfurization (FGD) control equipment for the two main boilers (B003, B004). Please explain and make the necessary corrections in the permit and the Statement of Basis.
2. Section B(8) on page 20 of the draft permit says that the applicable requirements of the Cross-State Air Pollution Rule will be included in the Final Title V permit. This is problematic because this provides no opportunity to review those permit conditions if they're included in the Final permit and not the draft permit. Please explain and make the necessary changes.
3. For the Coal Handling System (F001), the FGD Landfill Material Handling Operations and Storage Piles (F002), and the Roadways & Parking (F003), there are requirements for daily inspections for fugitive dust but only for the purposes of whether additional pollution control is necessary. There is no required visible emission testing required to assure compliance with the fugitive dust, opacity, visible emission limits. Please add this to the permit along with associated recordkeeping.
4. For the three emission units listed in comment 3 above, there is emission testing in the permit for visible emissions, PM limits, and opacity limits. The permit lists the different test methods, but also says the testing should happen "if required". It is difficult to

determine whether the testing is required and at what frequency. Please explain and make the necessary changes. The same "if required" permit language is in multiple places in the permit for other emission units.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Richard Angelbeck at (312) 886-9698.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico for".

Genevieve Damico  
Chief  
Air Permits Section