



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

AUG 29 2016

REPLY TO THE ATTENTION OF

Andrew Hall
Permit Review/Development Section
Ohio Environmental Protection Agency
Department of Air Pollution Control
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 permit renewal (permit number P0085253) for Avon Lake Power Plant located in Avon Lake, 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. The Statement of Basis should identify and discuss all permit changes that have occurred since the last permit (see 40 CFR § 70.7(a)(5)). Please revise the Statement of Basis to identify and discuss all such changes including, but not limited to the April 19, 2016 Permit to Install (PTI) (permit number P0120245) as well as incorporation of both 40 CFR Part 63, Subpart UUUUU, also known as the Utility Mercury and Air Toxics Standard (MATS) and the Cross-State Air Pollution Rule (CSAPR) also known as the Transport Rule.
2. Permit condition B.3.a) (page 18) states that the source is subject to the Transport Rule (TR) and is subject to the requirements for both the TR Nitrogen Oxide (NOx) Annual Trading Program and the TR NOx Oxone Season Trading Program. This permit condition should also state that the source is subject to the TR Sulfur Dioxide Group 1 Trading Program requirements. The permit lacks the NOx Trading Program requirements. Please add these to the permit.
3. Permit conditions B.9 (page 22) and C.1.b.2f) (page 29) erroneously state that Boiler #10 (emission unit B010) is exempt from the MATS rule because its average annual heat input was limited to below 10 percent of its average annual heat input during any 3 calendar years. It appears that emission unit B010 is subject to the MATS rule because 40 CFR § 63.10042 states the definition of Coal-Fired Electric Utility Steam Generating Unit as burning "coal for more than 10 percent of the annual heat input during the previous calendar years after the compliance date" for a facility, and the compliance date

for Avon Lake was extended to April 16, 2016. Also, the 10 percent heat input restriction was made a federally enforceable restriction as recently as April 19, 2016 in permit to install number P0120245. Please add all the MATS requirements that are applicable to emission unit B010 to the permit.

4. For Boiler #12 (emission unit B012), permit conditions C.1), C.2.d.12), C.2.e.8), C.2.f.2) on pages 42, 47, 53, and 57 respectively, list MATS section requirements and that the permittee shall comply with the "applicable" requirements of those MATS sections. These permit conditions should be more specific and identify which specific requirements apply to this emission unit. Please update the permit accordingly.
5. Permit condition C.2.d.15.e) (page 49) states that for a visible emissions incident, the observer does not have to document the exact start and end times for the visible emissions incident. This seems understandable, but the observer is not required to note the date or time of the incident. Please revise the permit so that the observer is required to record the date and approximate time of the incident in the operations log.
6. Permit conditions C.2.f.1.c), C.3.f.1.b), C.5.f.1.a,b and c, C.6.f.a), and C.7.f.1.a-c) on pages 56, 61, 70, 77, and 89-90 respectively, include the phrase "If required" emissions testing is to occur. Pursuant to 40 CFR §70.6(a)(3), the permit must require monitoring, recordkeeping and testing sufficient to assure compliance. The permit term, as written, does not require compliance testing, just the option that testing could at some time be required. The permit should include a regular testing schedule of at least once a month for opacity and once a permit term for the other pollutants. Please update the permit accordingly.
7. Permit condition C.5.b.2.d) (page 67) states that the permittee shall "treat each coal storage pile with water and/or other suitable dust suppression chemical at sufficient treatment frequencies to ensure compliance." Please add to the permit and explain in the Statement of Basis what the expected frequency or criteria to determine the frequency of treatment should be.
8. Permit condition C.5.b.2.e) (page 67) states that the permittee shall use "precautionary operating practices" to minimize wind erosion from the coal storage piles. The "precautionary operating practices" language is an undefined term in the permit. Please specify these precautionary operating practices in the permit as requirements.
9. Permit conditions C.5.d.1-4 (page 68) and C.6.d.1-4 (pages 74-75) require inspections on a weekly basis at a minimum for the coal pile and coal handling. We appreciate the minimum inspection frequency of a weekly basis, but we suggest considering a more frequent basis when weather conditions warrant.
10. Permit conditions C.7.d.8 and C.7.e.4 on pages 85 and 88, respectively, list 40 CFR Part 63, Subpart DDDDD section requirements and that the permittee shall comply with the "applicable" requirements of those Subpart DDDDD sections. These permit conditions

must be more specific and identify which specific requirements apply to this emission unit. Please update the permit accordingly.

11. Permit conditions B.9 on page 22 and C.2 on page 39 both mention activated carbon injection (ACI) and dry sorbent injection as pollution controls for Boiler #12, but they are not listed as actual permit requirements. As written, the permit does not require the use of these pollution control technology equipment for Boiler #12, nor does it include/require any operating parameters, recordkeeping or reporting for those pollution control technology equipment. Neither the permit nor the Statement of Basis contains any pollution control equipment for any of the emission units throughout the permit. Please revise the permit and Statement of Basis to require the use of the ACI and dry sorbent injection whenever Boiler #12 is operating, and to include the pollution control technologies and equipment used on all the emission units including the associated operating parameters, monitoring, recordkeeping and reporting.

We appreciate the opportunity to provide comments on this permit and look forward to discussing them with you. If you have any questions, please feel free to contact Richard Angelbeck, of my staff, at (312) 886-9698.

Sincerely,



Genevieve Damico
Chief
Air Permits Section