



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

AUG 11 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 Suit 700
PO Box 1049
Columbus, Ohio 43216

Dear Mr. Hall,

The U.S. Environmental Protection Agency has reviewed the draft Title V Operating Permit (permit number P0099746) for Miami Fort Power Station in North Bend, Ohio. To ensure that the source meets 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. Permit conditions C.1.b)(1)e. and C.2.b)(1)h. should clarify that the emission limitations listed from 40 CFR Part 63, Subpart UUUUU, Table 2 are under item 1 in that table ("coal-fired unit not low rank virgin coal").
2. Permit conditions C.1.c) and C.2.c), list the requirements of 40 CFR Part 63, Subpart UUUUU, Table 3 ("work practice standards and operating limits"). This permit condition should be more specific, identifying which requirements from Table 3 apply to this source. Please update this permit accordingly.
3. Throughout the permit, including conditions C.1.d)(7), C.1.d)(8), C.2.d)(12), C.7.d)(2), C.8.d)(2), C.8.e)(1), C.9.b)(2), C.12.b)(2)d., vague terms such as "expeditiously," "prompt," "promptly," and "adequately" are used. To improve clarity and the practical enforceability of the terms and conditions, the permit should specify and include additional details on what these terms mean¹.
4. Permit conditions C.3.d), C.4.d), C.5.d), C.6.d), C.9.d), C.10.d), C.11.d), and C.12.d), include requirements for scheduled inspections of various emission sources. The permit does not specify inspection procedures, action level or cite to any inspection protocols which the facility currently employs. Please update the permit to include inspection procedures and action level or provide a citation to where inspection procedures may be found.
5. Permit conditions C.7.f)(1), C.8.f)(1), C.9.d)(4), C.9.f)(1), C.10.d)(5), C.10.f)(1), C.11.d)(3), C.11.f)(1), C.12.d)(3), and C.12.f)(1) require that various emissions are calculated for each type

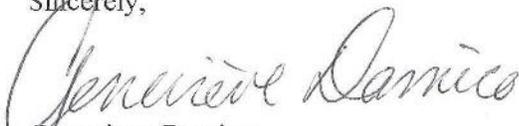
¹ This is consistent with EPA's September 22, 2005, Midwest Generation Waukegan Generation Station Title V Petition Order (V-2004-5), (see Section VI.C.3., pg. 13).
https://www.epa.gov/sites/production/files/2015-08/documents/midwest_generation_waukegan_decision2004.pdf

of operation. The conditions do not include calculation methods and specified emission factors that should be used to determine compliance. The permit should be revised to identify the calculation methods.

6. Conditions C.3.f), C.4.f), C.5.f), C.6.f), C.7.f), C.8.f), C.9.f), C.10.f), C.11.f), C.12.f), and C.13.f) include the phrase "If appropriate" visible emission testing will be completed. 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, doesn't 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.
7. Permit conditions C.8.f)(1)a., C.9.f)(1)c and d, C.10.f)(1)c., C.11.f)(1)a. and b, C.12.f)(1)b. and c. cite to operational parameters and assumptions outlined in other documents, such as permit applications, permits-to-install, etc. Pursuant to 40 CFR 70.6(a)(1), the permit should include all applicable requirements including specific operational parameters assumed in other permits. Please include the applicable requirements in the permit.
8. Permit conditions C.8.f) and C.13.f) include language that says "If required" testing will be completed for particulate emissions and sulfur dioxide. 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, doesn't require compliance testing. The permit should include a regular testing schedule of at least once a permit term for these pollutants.
9. Permit condition C.7.d)(2) includes requirements to continuously monitor the pressure drop across the baghouse. The permit should require the permittee to record readings more often to more accurately reflect facility operations.

We appreciate the opportunity to provide comment on this draft permit. If you have any questions, feel free to contact me or Charmagne Ackerman, of my staff, at (312) 886-0448.

Sincerely,


Genevieve Damico
Chief
Air Permits Section