



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

REPLY TO THE ATTENTION OF

JUN 13 2016

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

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Title V permit renewal, permit number P0105126, for W.H. Zimmer Power Station located in Moscow, 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. Permit condition B.14.b) (*pg. 21*) states that the emission unit subject to the Transport Rule (TR) is subject to the requirements for the TR Nitrogen Oxides (NO_x) Annual Trading Program and the TR NO_x Ozone Season Trading Program. This condition should also state that the unit is subject to the TR Sulfur Dioxide (SO₂) Group 1 Trading Program requirements.
2. Permit condition 1.b)(1)g. (*pg. 29*) 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").
3. Permit condition 1.c)(3) (*pg. 34*), lists the requirements of 40 CFR Part 63, Subpart UUUUU, Table 3 and 4 ("work practice standards and operating limits"). This permit condition should be more specific as to which requirements from Tables 3 and 4 apply to this source. Please update this permit accordingly.
4. Compliance with the 1,406 tons per year (tpy) carbon monoxide limit on unit B006 is based on AP-42 emission factors and coal usage records (permit condition 1.f)(1)e., *pg. 53*). The draft permit currently states that emission testing is optional for this limit. The permit should require emission testing to verify the accuracy of the emission factor.

5. Compliance with the 84 tpy volatile organic compounds (VOC) limit on unit B006 is based on an emission factor and the maximum rated heat input capacity of the unit (permit condition 1.f)(1)f., pg. 54). The draft permit currently states that emission testing is optional for this limit. The permit should require emission testing to verify the accuracy of the emission factor.
6. Permit conditions 6.d)(1) (pg. 80), 7.d)(2) (pg. 87), and 8.d)(1) (pg. 92) require the permittee to perform weekly visible emission checks on the coal, fly ash, and lime handling systems "when the weather conditions allow." Please clarify the criteria for determining when weather conditions allow for these visible emission checks.
7. Permit conditions 6.f)(1)a. (pg. 82) and 8.f)(1)a. (pg. 94) use weekly visible emission checks to determine compliance with the 0.03 gr/dscf emission limit on the coal handling system. The permit and/or the permit record should adequately demonstrate how the visible emissions checks correlate to compliance with the 0.03 gr/dscf limit.
8. Permit condition 9.b)(2)c. (pg. 99) states that the "Best Available Technology (BAT) emission limitations for PM₁₀, PM_{2.5}, SO₂, and VOC specified in b)(2)e. and b)(2)f. below apply until U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii)..." However, the permit does not specify which emission limitations will apply after such approval. The permit must clarify the emission limits that would apply to the source after this action is completed.
9. The auxiliary boilers (B007, B008) are subject to a synthetic minor NO_x emission limit of 39.8 tpy rolled monthly in permit condition 9.b)(1)a. (pg. 96) pursuant to P0111498 issued on April 23, 2013. In addition, these units are subject to a NO_x limit of 0.10 lb/mmBtu in permit condition 9.b)(1)b. (pg. 97) pursuant to Ohio Revised Code 3704-03(T). Compliance with the 0.10 lb/mmBtu limit is to be determined by emission testing as described in permit condition 9.f)(2) (pg. 113-114). Permit condition 9.d)(5)(1) (pg. 105) says that monthly NO_x emissions are to be calculated based on the NO_x emission rate derived from the test results in f)(2). The permit should clarify how compliance with the 0.10 lb/mmBtu limit assures compliance with the 39.8 tpy limit.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Sam Portanova, of my staff, at (312) 886-3189.

Sincerely,



Genevieve Damico
Chief
Air Permits Section