



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

JUN 22 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 Prevention of Significant Deterioration Permit to Install (permit number P0119495) for South Field Energy LLC in Wellsville, 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. Throughout the permit several Federal regulations are cited (40 C.F.R. Part 60, Subpart A, 40 C.F.R. Part 60, Subpart Dc, 40 C.F.R. Part 60, Subpart KKKK, 40 C.F.R. Part 60, Subpart TTTT, 40 C.F.R. Part 60, 40 C.F.R. Part 60, Subpart IIII, 40 C.F.R. Part 63, Subpart A and 40 C.F.R. Part 63, Subpart ZZZZ) as applicable regulations, however, the permit does not specify which portions of the regulations are applicable to the facility. Guidance provided in White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program¹ (White Paper 2) indicates that where only portions of a referenced document applies, permits must specify the relevant sections. Per the guidance in White Paper 2 and to improve clarity, the permit should be revised to include the applicable portions of the aforementioned subparts.
2. The emission limitation for sulfur dioxide (SO₂) for B001 assumes a specific sulfur content in the natural gas used as fuel. The operational restrictions do not restrict the sulfur content in the natural gas to the assumptions used in developing the emission limit. The section of the permit containing the requirements for B001 should also include a limit on the sulfur content allowable in the natural gas being fired at the facility.
3. Testing conditions through the permit (C.1.f)(1) for B001; C.2.f)(1)a. for P001 and P002; and all testing for P003 and P004) include language that says "If required" testing will be completed for several pollutants. In accordance with 40 C.F.R. 70.6(c)(1), the

¹ <https://www3.epa.gov/ttn/caaa/t5/memoranda/wtppr-2.pdf>

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 month for opacity and once a permit term for the other pollutants.

4. Conditions C.1.f)(1)d., C.4.f)(1)d. discuss how the hourly emission limitations for SO₂ were developed. The conditions are not methods of determining compliance with the limitation, nor do they account for any sulfur content variability that the facility may experience with its fuel shipments. To improve enforceability and clarity, the permit should include a calculation method which uses the actual sulfur content data collected by the facility.
5. Conditions C.1.b)(2)l., C.2.b)(2)g. and C.4.d)(2) require that the quality of diesel fuel received meet sulfur content specifications and compliance with these requirements will be determined by analysis by the permittee or oil supplier. The conditions do not include the timeframe in which a sample must be analyzed, corrective action procedures, recordkeeping or reporting requirements to be followed if the analysis determines that the diesel fuel received does not meet permit specifications. To improve enforceability and clarity of this condition, the permit should include the following:
 - a. Specify timeframe in which the sample must be analyzed;
 - b. Corrective action procedures;
 - c. Recordkeeping requirements; and
 - d. Reporting requirements.
6. Condition C.2.b)(2)j. does not include start-up or shutdown emission limit for particulate matter 10 micrometers or less in diameter/ particulate matter 2.5 micrometers or less in diameter (PM_{2.5}), SO₂, or sulfuric acid mist. Please revise the condition to include start-up and shutdown emission limits for these pollutants if the limitations are different than during normal operations.
7. Please verify the permit condition citation in Condition C.2.d)(7). The condition allows the permittee to "elect not to monitor the total sulfur content of the fuel combusted in the turbine as specified in d)(7)," which is confusing, since the condition references itself. Furthermore, it is not clear from the condition when the facility must decide if they will choose one of the options provided in the permit, any notifications that need to be made to Ohio Environmental Protection Agency, or if the facility may change options once they have chosen. The citation in the condition should be verified and the permit should include notification requirements and additional details regarding the election process.
8. Condition C.2.f)(1)l.ii. describes the calculation method for SO₂ emissions when burning ultra low sulfur diesel (ULSD) fuel. The calculation allows the permittee to calculate emissions based on the average percent sulfur of the ULSD fuel used during the month or 0.0015% sulfur. The option to use 0.0015% sulfur should be removed, because the variations of sulfur content in the ULSD fuel cannot be taken into account and is not reflective of actual operations at the facility.

9. Condition C.5.d) are monitoring requirements for P005 and P006 require a conductivity meter or other equipment to continuously monitor and record total dissolved solids concentrations of the cooling water. The conditions do not require the establishment of operating parameters or acceptable operating range. The permit should include the acceptable operating range to indicate to the facility when corrective actions need to be taken. Additionally, corrective actions are not identified in the permit. To improve the enforceability and clarity of this condition, the permit should include the following:
 - a. Establishment of operating parameters or operating range;
 - b. Identify corrective actions; and
 - c. Timeframe in which corrective actions need to be initiated.
10. Please ensure that the start-up and shut down emissions are accounted for in the emission limits and the air dispersion modeling.
11. Make sure to include the emissions from the emergency diesel generator and the emergency diesel fire pump in your PM_{2.5} modeling analysis.

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