


Division of Air Pollution Control

**Response to Comments
Draft Rule Language Comment Period**

Rule: Ohio Administrative Code (OAC) rules 3745-18-01, and 3745-18-03 to 3745-18-94, 5-year review

Agency Contact for this Package

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Ohio EPA provided a 30 day comment period which ended on June 25, 2010. This document summarizes the comments and questions received at the public hearing and/or during the associated comment period.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. The name of the commenter follows the comment in parentheses.

Rule 3745-18-04(D)(8)(d)(ii), "Measurement methods and procedures"

Comment 1: The boilers owned by The Procter & Gamble Company are currently being operated by DEGS of St. Bernard, LLC. Boiler Number 3, OEPA Emission Unit Number B021, has been permanently shut down and demolished. We suggest that this section of the regulations be revised as follows: "DEGS of St. Bernard, LLC" (OEPA Premise Number 1431394148); Boiler Number 4 (OEPA Emission Unit Number B022); one representative coal sample per day for analysis. The sample shall consist of at least fourteen sample increments weighing a minimum of two pounds each." (John F. Funke, Duke Energy)

P&G Boiler B021 currently listed in 3745-18-04 (D)(8)(d)(ii) officially shut-down 5/2001. The boiler was retired on that date and never ran again. (However the use of that boiler was substantially reduced between 1998 and 1999 if that's important in any way.) (Maxine Dewbury, Procter & Gamble)

Response 1: Thank you for your comment. Based on the information provided, Ohio EPA has confirmed that the facilities cited should be removed from the rule and the amendments have been made.

Rule 3745-18-04(D)(8)(d)(vii), "Measurement methods and procedures"

Comment 2: Miami Fort Station Unit Numbers 5-1 and 5-2 are permanently shut down and rendered incapable of operating. We suggest that this section of the regulations be revised as follows: "Duke Energy Ohio, Miami Fort Station (OEPA Premise Number 1431350093); Unit Numbers 6, 7 and 8 (OEPA Emission Unit Numbers B007, B015 and B016); one representative coal sample per day for analysis which shall be conducted according to the appropriate ASTM method." (John F. Funke, Duke Energy)

Response 2: Thank you for your comment. Based on the information provided, Ohio EPA has confirmed that the facilities cited should be removed from the rule and the amendments have been made as suggested above.

Rule 3745-18-15 (H)(2), "Butler County Emission Limits"

Comment 3: Dicks Creek Station Unit 2, OEPA Emissions Unit Number B002, has been permanently shut down for many years. We request that this section of the regulations be deleted.

My records indicate that Dicks Creek Unit 2 was retired on March 15, 1981. (John F. Funke, Duke Energy)

Response 3: Thank you for your comment. Based on the information provided, Ohio EPA has confirmed that the facility cited should be removed from the rule and have made the appropriate amendments.

Rule 3745-18-37(BB)(1) and (BB)(2), "Hamilton County Emission Limits"

Comment 4: Miami Fort Station Units 3-1, 3-2, 4-1, 4-2, 5-1, and 5-2, OEPA Emissions Unit Numbers B001-B006, respectively, are permanently shut down and rendered incapable of operating. Enclosed are our notification letters regarding the shutdown of the units. We request that Sections (BB)(1) and (2) in the regulations be deleted. (John F. Funke, Duke Energy)

Response 4: Thank you for your comment. Based on the information provided, Ohio EPA has confirmed that the facilities cited should be removed from the rule and have made the appropriate amendments.

Rule 3745-18-37(BB)(4), "Hamilton County Emission Limits"

Comment 5: Miami Fort Station Gas Turbines GT-1 and GT-2, OEPA Emission Unit Numbers BOO8 and 8009, have been permanently shut down and removed from the site. Enclosed is our notification letter regarding the shut t and removal of the gas turbines. We suggest that this section of the regulations be revised as follows: "Gas turbine numbers GT-3 through GT-6 (OEPA Emissions Unit Numbers BOIO through B013); a maximum of 0.5 pounds of Sulfur Dioxide per MMBTU actual heat input." (John F. Funke, Duke Energy)

Response 5: Thank you for your comment. Based on the information provided, Ohio EPA has confirmed that the facilities cited should be removed from the rule and have made the appropriate amendments.

Rule 3745-18-37(BB)(7), "Hamilton County Emission Limits"

Comment 6: OAC 3745-18-37 (BB)(7) is no longer applicable and we request that it be deleted. Miami Fort Station Units 5-1 and 5-2, Emission Unit Numbers BOO5 and B006, are permanently shut down and rendered incapable of operating. A 590 feet tall stack currently serves Miami Fort Station Unit 6, Emissions Unit Number 8007. Enclosed is our notification letter regarding Unit 6 and the completion of the new stack. (John F. Funke, Duke Energy)

Response 6: Thank you for your comment. Based on the information provided, Ohio EPA has confirmed that the facilities cited should be removed from the rule and have made the appropriate amendments.

Rule 3745-18-37(GG), "Hamilton County Emission Limits"

Comment 7: The boilers owned by The Procter & Gamble Company and located at 5201 Spring Grove Avenue are currently being

operated by DEGS of St. Bernard, LLC, OEPA Premise Number 1431394148. We suggest that this section of the regulations be revised as follows: "DEGS of St. Bernard LLC" (OEPA Premise Number 1431394148), the operator and permit holder of the following source shall not cause or permit the emission of sulfur dioxide from the following source to exceed the amounts indicated, shall use stacks no lower ...

Alternately, if OEPA prefers to keep Procter & Gamble's name in this section, please correct the spelling of The Procter & Gamble Company's name and the address. (John F. Funke, Duke Energy)

Response 7: Thank you for your comment. OEPA has made the change to update the name of the facility, the name of the facility operator, and the facility address in the rule.

Rule 3745-18-37(GG)(1), "Hamilton County Emission Limits"

Comment 8: Boiler Numbers 1 and 2, OEPA Emission Unit Numbers BOO1 and BOO8 have been permanently shut down and demolished. We request that Section (GG)(I) in the Sulfur Dioxide Regulations be deleted. (John F. Funke, Duke Energy)

P&G boilers number 1 and 2, (Emission unit numbers B001 and B008, respectively), currently listed in 3745-18-37 (GG) (1) both shut-down 7/1999 (Maxine Dewbury, Procter & Gamble)

Response 8: Thank you for your comments. Based on the information provided, Ohio EPA has confirmed that the facilities cited should be removed from the rule and the amendments have been made.

Rule 3745-18-37(GG)(2), "Hamilton County Emission Limits"

Comment 9: This section of the regulations is no longer applicable and we request that it be deleted. Boiler Numbers 1, 2 and 3, OEPA Emission Unit Numbers B001, BOO8 and B021, respectively, have been permanently shut down and demolished. The applicable sulfur dioxide emission requirements for Boiler Number 4, OEPA Emission Unit Number B022, the remaining boiler referenced in Section (GG)(2), can be found in OAC 3745-18-37 (BB)(4). (John F. Funke, Duke Energy)

P&G Boiler B021 currently listed in 3745-18-04 (D)(8)(d)(ii) officially shut-down 5/2001. The boiler was retired on that date and never ran again. (However the use of that boiler was substantially reduced between 1998 and 1999 if that's important in any way.) (Maxine Dewbury, Procter & Gamble)

Response 9: Thank you for your comments. Based on the information provided, Ohio EPA has confirmed that the facilities should be removed from the rule and the amendments have been made.

Rule 3745-18-37(GG)(3), "Hamilton County Emission Limits"

Comment 10: Boiler Number 3, OEPA Emission Unit Number B021, has been permanently shut down and demolished. We request that this section of the regulation be deleted. (John F. Funke, Duke Energy)

Response 10: Thank you for your comment. Based on the information provided, Ohio EPA has confirmed that the facility cited should be removed from the rule and the amendments have been made.

Rule 3745-18-54, "Lucas county Emission Limits"

Comment 11: It appears that one of the main reasons for the current proposed revision to 3745-18 is to remove limits for facilities that have been shutdown for more than 5 years. The following facilities in Lucas County have been shutdown for more than 5 years, but are not identified in the draft rule revision as being removed from the rule.

3745-54-18(H) Gulf Oil Company 0448010060

3745-54-18(M) Toledo Edison Water Street Station
0448010087

3745-54-18(Q) Interlake Incorporated 0448010397

I don't have a shutdown date for these. I started working here in 1992 and these had all been shutdown many years prior to then. If necessary, we may be able to go back to the paper copies of the emission inventory files to get an approximate year, but these shutdown dates all occurred prior to the 1990's. (Matthew Stanfield, Ohio EPA Northwest Office)

Response 11: Thank you for your comment. Based on the information provided, Ohio EPA has confirmed that the facilities cited should be removed from the rule and have made the appropriate amendments.

End of Response to Comments