



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

February 8, 2010

CERTIFIED MAIL

Mr. Richard Burns
Youngstown Thermal
205 North Ave.
Youngstown, OH 44502

RE: **NOTICE OF VIOLATION FOR SULFUR DIOXIDE EMISSIONS**
YOUNGSTOWN THERMAL
DAPC FACILITY ID # 02 50 11 0024

Dear Mr. Burns:

This letter is being sent in response to the third and fourth quarter 2009 Excess Emission Reports that were submitted electronically by Youngstown Thermal on October 12, 2009 and January 18, 2010, respectively. The coal data analyses provided with the reports indicated that the monthly sulfur dioxide (SO₂) emission rate has been above the permitted limit since the coal sample collected in August 2009. This is a violation of the Title V permit issued February 16, 2007 and Ohio Administrative Code (OAC) rule 3745-18-56(E).

Specifically, section A.I.1. of the Title V permit for emissions units B002 – B004 states that “the sulfur dioxide emissions shall not exceed 4.7 lbs/mmBtu actual heat input.” In order to ensure compliance with this limit, the following operational restriction was placed in section A.III.2. of the permit: “The quality of the coal burned in this emissions unit shall be restricted to a sulfur content which is sufficient to comply with the allowable sulfur dioxide limitation...”. Per the permit, the coal burned is to be sampled two days per week from the coal feeder and composited monthly. This monthly sample is then analyzed for percent sulfur and heat content, along with other values, and the SO₂ emission rate is calculated based on the following equation (from OAC rule 3745-18-04(F)):

$$\text{lbs SO}_2/\text{mmBtu} = (1 \times 10^6)/H \times S \times 1.9$$

Where: H = the heat content of the solid fuel in Btu/lb;
S = the decimal fraction of sulfur in the solid fuel.

The results from the monthly coal analyses that exceeded the emission limitation are summarized in the following table:

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Month	SO ₂ emission rate (lbs SO ₂ /mmBtu)
August 2009	4.71
September 2009	4.77
October 2009	4.91
November 2009	4.95
December 2009	4.76

Please provide a written explanation for the exceedances of the SO₂ emission limitation, along with a timeline for implementing corrective measures to prevent similar occurrences in the future. This information should be submitted **within 14 days** of receipt of this letter.

The submission of the above information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. The determination to pursue or decline such penalties in this case will be made by the Ohio EPA at a later date. Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. Failure to respond within the specified time frame can result in further enforcement action, up to and including a referral to Ohio EPA's Central Office.

Should you have any questions regarding this matter, please feel free to contact me at (330) 963-1261.

Sincerely,



Jana L. Gannon
Environmental Specialist
Division of Air Pollution Control

JLG/mt

cc: Tom Kalman, Ohio EPA, DAPC, CO
Lisa Holscher, U.S. EPA, Region 5
Tim Fischer, Ohio EPA, DAPC, NEDO

ec: Ed Fasko, Ohio EPA, DAPC, NEDO
Misty Koletich, MTAPCA