Attachment 5

First Quarter 2009 Excess Emissions Reports

Ohio EPA
Division of Air Pollution Control

Interoffice communication

to:	DAPC Managers; EER Contacts
from:	Todd Brown, CEMS/COMS Coordinator
subject:	1st Quarter, 2009, EER Summary Report
date:	July 2009

Attached is the first quarter, 2009, excess emissions reports ("EER") summary report. Data used to compile this report were taken from all EERs received as of the morning of July 30, 2009. Second quarter, 2009, EERs will be expected no later than August 15, 2009, and reports received after this date may show as late/not received in the next quarterly EER summary report.

As noted last quarter, the manner in which some emissions unit's excess emissions are being evaluated in order to be included in the "EER Action Recommendations" table has been modified. In addition to the minimum 5 % downtime and/or 5% excess emissions action levels that have been included in previous recommendations, emissions units that are subject to OAC rule 3745-17-03 B(1)(b)(i) are now also being included at the rule's required 1.1% limit for excess opacity. These emissions units will still need to be in operation at least 5% of the quarter before including the 1.1 % data in the table.

Recently Central Office has become aware of several CEMS, CERMS and COMS that have been in operation, some for many years, that have never been certified. Many of these monitors were required pursuant to consent decrees, or newer rules and regulations that may or may not have been incorporated into a facility's permit. Most, if not all, of the CEMS, CERMS, and COMS that are required pursuant to permit terms and conditions, rules or regulations, or consent decrees, need to be certified.

Please keep in mind that **ALL** CEMS, CERMS or COMS that are required to be certified must submit initial intent to test ("ITTs") notifications to Central Office at lease 30 days prior to the scheduled tests. Initial test reports must also be sumitted to Central Office for review. Central Office will witness certification testing, review the testing reports, and generate a letter acknowledging the certification status of all systems that meet certification requirements. Systems that do not have a certification letter on file are not considered certified, and their data is not considered valid for ongoing compliance demonstrations. Additionally, if the system is not certified, data are not being included in EER data files that are submitted to USEPA on a quarterly basis.

Again, if the systems do not have a certification letter on file, the systems are not considered certified, and the facility may be in violation of permit terms and conditions, rules or regulations, or consent decree requirements. Please keep this in mind during facility inspections and permit reviews. Call me if you have any questions regarding the certification status of a specific system.

Please review the data included in this summary for facilities within your jurisdiction. Corrections or adjustments should be sent to my attention. If you have questions regarding this report, or suggestions that would make the report more useful or easier to read, please call me at (614) 644-4839, or email me at <<todd.brown@epa.state.oh.us>>.

Ohio EPA Division of Air Pollution Control
Executive Summary as of Quarter 1, 2009

	Facilities	Sources	Monitors	Unique Combinations	REPORTING INFORMATION ONTIME	LATE OR NOT RECEIVED	PERCENT ON TIME
CDO	13	26	48	49	49	0	100.00
NEDO	21	50	58	67	66	1	98.51
NWDO	23	57	75	93	93	0	100.00
TOLEDO	7	47	40	70	70	0	100.00
SEDO	20	77	101	150	150	0	100.00
PORTSMOUTH	5	12	40	40	40	0	100.00
RAPCA	8	32	56	64	61	3	95.31
CLEVELAND	6	16	12	19	17	2	89.47
HCDES	19	51	94	102	102	0	100.00
CANTON	3	19	21	33	33	0	100.00
AKRON	4	11	9	13	13	0	100.00
NOVAA	0	0	0	0	0	0	******
TOTAL	129	398	554	700			

AVERAGE DO 99.72 AVERAGE LAA 98.53
AVERAGE DO & LAA 99.14

PERCENT OF MONITORED EMISSIONS UNITS EXPERIENCING NON-EXEMPT EXCESS EMISSIONS

COUNT		PERCENT
13	1.0 TO 1.9 PERCENT NON-EXEMPT EXCESS EMISSIONS>>>	1.86
2	2.0 TO 2.9 PERCENT NON-EXEMPT EXCESS EMISSIONS>>>	0.29
3	3.0 TO 3.9 PERCENT NON-EXEMPT EXCESS EMISSIONS>>>	0.43
0	4.0 TO 4.9 PERCENT NON-EXEMPT EXCESS EMISSIONS>>>	0.00
25	5.0 PERCENT AND GREATER NON-EXEMPT EXCESS EMISSIONS>>>	3.57

PERCENT OF MONITORED EMISSIONS UNITS EXPERIENCING MONITOR DOWNTIME

COUNT		PERCENT
39	1.0 TO 1.9 PERCENT MONITOR DOWNTIME>>>	5.57
13	2.0 TO 2.9 PERCENT MONITOR DOWNTIME>>>	1.86
7	3.0 TO 3.9 PERCENT MONITOR DOWNTIME>>>	1.00
6	4.0 TO 4.9 PERCENT MONITOR DOWNTIME>>>	0.86
34	5.0 PERCENT AND GREATER MONITOR DOWNTIME>>>	4.86

> 5 % CEMS Downtime

Premise	Facility Name	Source	Monitor ID	Source Time	CEMS Downtime	% Time CEMS Down
0165000132	DARBY - DPL ENERGY	P001	C034	48	36	75.00
0 000132	DARBY - DPL ENERGY	P001	N272	48	36	75.00
0165000132	DARBY - DPL ENERGY	P001	N276	48	36	75.00
0165000132	DARBY - DPL ENERGY	P002	C035	42	36	85.71
0165000132	DARBY - DPL ENERGY	P002	N273	42	36	85.71
0165000132	DARBY - DPL ENERGY	P002	N277	42	36	85.71
0165000132	DARBY - DPL ENERGY	P003	C036	42	36	85.71
0165000132	DARBY - DPL ENERGY	P003	N274	42	36	85.71
0165000132	DARBY - DPL ENERGY	P003	N278	42	36	85.71
0165000132	DARBY - DPL ENERGY	P004	C037	42	36	85.71
0165000132	DARBY - DPL ENERGY	P004	N275	42	36	85.71
0165000132	DARBY - DPL ENERGY	P004	N279	42	36	85.71
0165000132	DARBY - DPL ENERGY	P006	C044	36	30	83.33
0165000132	DARBY - DPL ENERGY	P006	N318	36	30	83.33
0165000132	DARBY - DPL ENERGY	P006	N319	36	30	83.33
0278000463	WCI STEEL - WARREN	B001	P569	129600	14580	11.25
0381000043	MONE GENERATING	P001	N324	2496	2495	99.96
0381000043	MONE GENERATING	P001	N325	2496	2495	99.96
0381000043	MONE GENERATING	P002	N326	1158	540	46.63
0381000043	MONE GENERATING	P002	N327	1158	540	46.63
0641090234	MINGO JUNCTION ENERGY	B001	N377	1080	60	5.56
0641090234	MINGO JUNCTION ENERGY	B004	S237	1080	60	5.56
0701000007	STUART - DAYTON POWER	B004	P283	65980	4057	6.15
0773000182	HAVERHILL NORTH COKE	P901	S239	129600	44640	34.44
0773000182	HAVERHILL NORTH COKE	P902	M001	129600	14520	11.20
0773000182	HAVERHILL NORTH COKE	P902	S288	129600	19931	15.38
0 /041124	CARGILL, INC.	B006	N086	47136	3060	6.49
1318003059	MEDICAL CENTER	B016	N374	76380	6840	8.96
1409090081	MIAMI UNIVERSITY	B010	P390	129600	129599	100.00
1409090081	MIAMI UNIVERSITY	B011	P390	129600	129599	100.00
1409090081	MIAMI UNIVERSITY	B012	P390	129600	129599	100.00
1431072596	CINCINNATI WATER	N004	P544	134	133	99.25
1576000074	ESSROC MATERIALS,	P902	P565	3668	368	10.03
1576000301	MARATHON ASHLAND	B029	N376	129600	8865	6.84

> 5% Excess Emissions

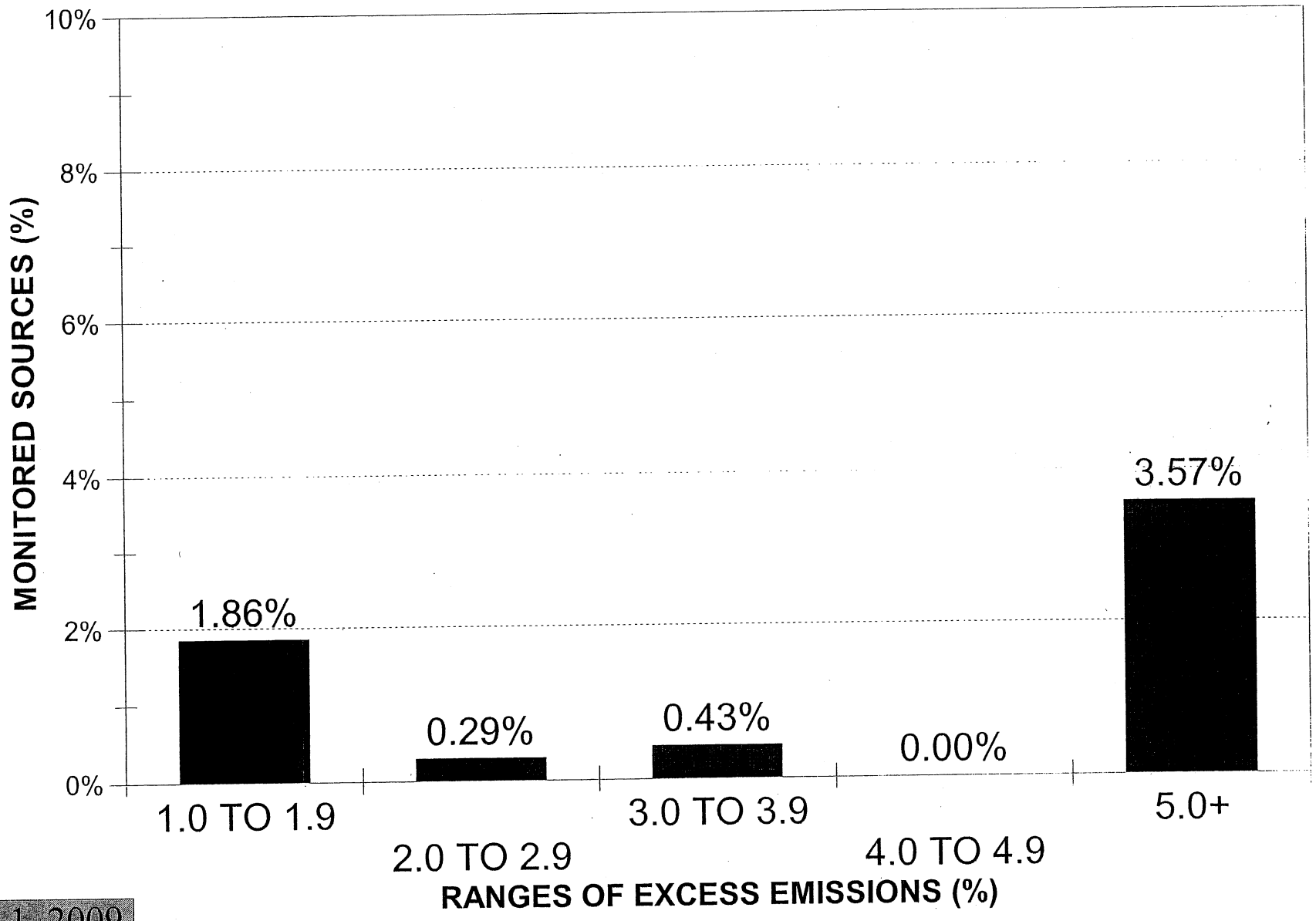
remise	Facility Name	Source	Monitor I.D.	Source Time	Source Time w/ CEMS	%Excess Emissions
5000006	PICWAY POWER PLANT - AEP	B004	P413	18744	18744	6.05
2020371	INEOS USA LLC	P035	C078	123180	123180	8.
7000377	TROY ENERGY CT#3 - Luckey	P003	N306	900	900	20.00
1090010	WHEELING PITTSBURGH STEEL	B103	H040	129600	129600	6.11
1090010	WHEELING PITTSBURGH STEEL	B104	H040	129600	129600	6.11
1090010	WHEELING PITTSBURGH STEEL	B105	H040	129600	129600	6.11
1090010	WHEELING PITTSBURGH STEEL	B106	H040	129600	129600	6.11
1090010	WHEELING PITTSBURGH STEEL	B107	H040	129600	129600	6.11
1090010	WHEELING PITTSBURGH STEEL	B108	H040	129600	129600	6.11
1090010	WHEELING PITTSBURGH STEEL	P006	H040	129600	129600	6.11
1090010	WHEELING PITTSBURGH STEEL	P007	H040	129600	129600	6.11
1090010	WHEELING PITTSBURGH STEEL	P008	H040	129600	129600	6.11
1090010	WHEELING PITTSBURGH STEEL	P911	H040	129600	129600	6.11
2000057	ROLLING HILLS GENERATING	P001	C060	180	180	66.67
2000057	ROLLING HILLS GENERATING	P001	N343	180	180	66.67
2000057	ROLLING HILLS GENERATING	P001	N344	180	180	33.33
2000057	ROLLING HILLS GENERATING	P002	C061	540	540	66.67
2000057	ROLLING HILLS GENERATING	P002	N345	540	540	55.56
2000057	ROLLING HILLS GENERATING	P003	C062	180	180	66.67
2000057	ROLLING HILLS GENERATING	P003	N347	180	180	66.67
2000057	ROLLING HILLS GENERATING	P003	N348	180	180	33.33
2000057	ROLLING HILLS GENERATING	P004	C063	180	180	66.67
2000057	ROLLING HILLS GENERATING	P004	N349	180	180	66.67
2000057	ROLLING HILLS GENERATING	P005	C064	420	420	71.43
2000057	ROLLING HILLS GENERATING	P005	N351	420	420	71.43

MISSING REPORTS

7/30/2009

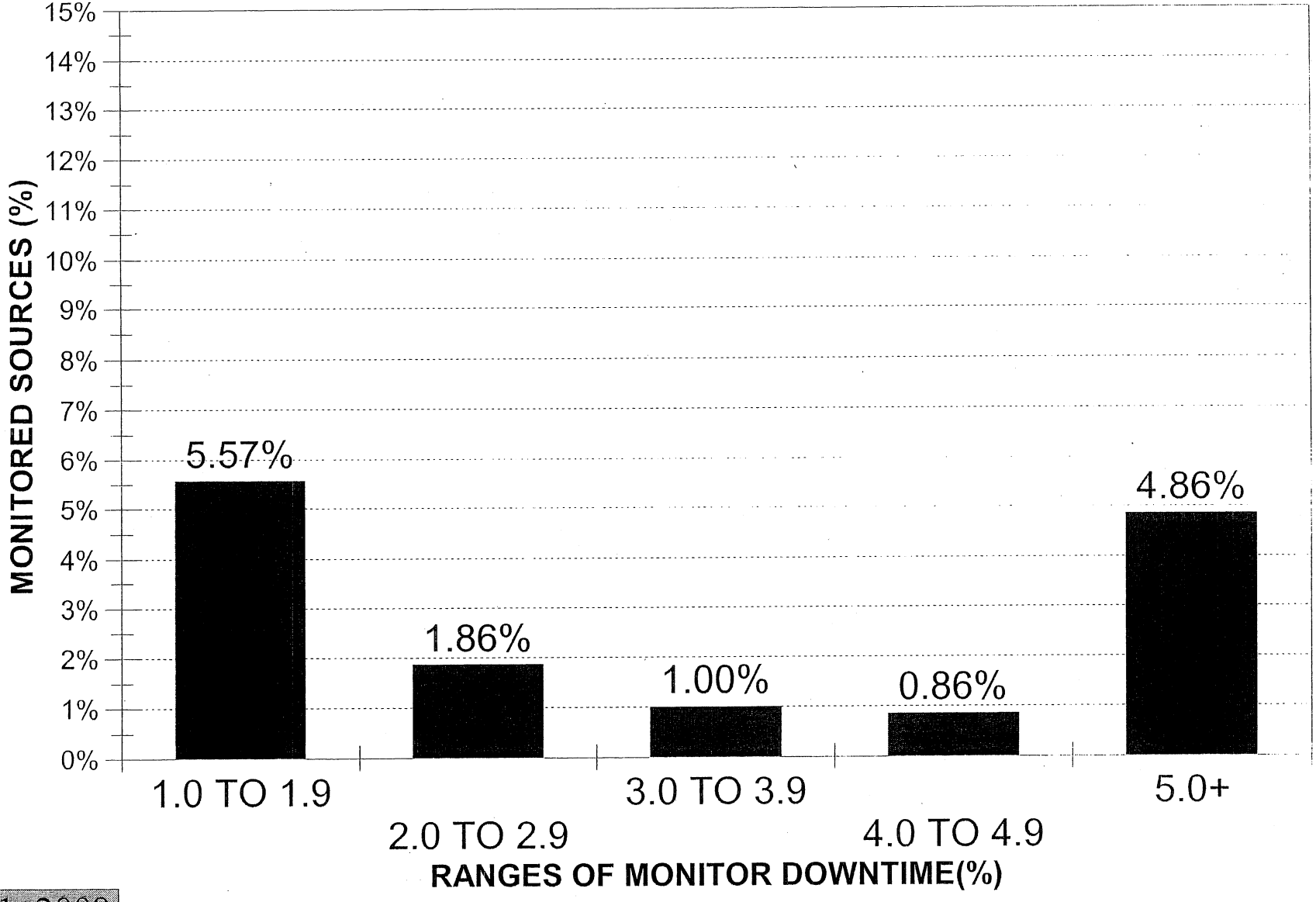
Premise	Source	Monitorid	Facility	Emissions unit	Year	Quarter
NEDO						
0247030884	P001	V005	POLY ONE - AVON LAKE	(ppm) VENT GAS ABSORBER	09	1
CLEVELAND						
1318270383	P901	P590	DiGERONIMO AGGREGATES LLC	Rotary Kiln	09	1

STATEWIDE SUMMARY OF MONITORED SOURCES IN RELATION TO NONEXEMPT EXCESS EMISSIONS



QTR: 1, 2009

STATEWIDE SUMMARY OF MONITORED SOURCES IN RELATION TO MONITOR DOWNTIME



QTR: 1, 2009

First Quarter, 2009
EER Action Recommendations

The following recommendations are made based expressly on excess emissions report ("EER") data from the third quarter of 2008 through the first quarter of 2009, based on all EERs received as of the morning of July 30, 2009. Source operation time, CEMS/COMS downtime, excess emissions, and the ability of a facility to correct problems from quarter to quarter were taken into account when making these recommendations. Action recommendations are only made for sources that were in operation at least 5% of the available time in the specified quarter. These are only recommendations, it is up to the district or local office to take appropriate action for any CEMS/COMS downtime or recorded excess emissions at assigned facilities. Recommendation do not take into account any actions that may already have been taken. The level of actions taken for CEMS/COMS downtime and recorded exceedences should be adjusted to take into account facility information that was not used in developing this list, such as Director's approved maintenance requests and monitor certification periods. Please be aware that this data may be the basis of future enforcement actions, so problems should be addressed accordingly.

Warning Letter

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2009	4th Quarter 2008	3rd Quarter 2008
0165000006	Picway Power Plant - AEP	B004	Opacity	6.05 % EE		
0278000463	WCI Steel, Warren	B001	Opacity	11.25 % DT		
				1.42 % EE		
0302020371	INEOS USA, LLC	P035	CO (lb/hr)	8.94 % EE		
0701000007	Stuart Station - DP&L	B004	Opacity	6.15% DT		
1431350093	Miami Fort	B016	Opacity	1.69 % EE		
1576000301	Marathon Ashland	B029	NOx (lb/mmBtu)	6.84 % DT		

NOV

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2009	4th Quarter 2008	3rd Quarter 2008
0773000182	Haverhill North Coke Company	P901	SO2 (lb/hr)	34.44 % DT		
		P902	SO2 (lb/hr)	15.38 % DT		
		P902	Hg (lb/hr)	11.2 % DT	18.35 % DT	
0857041124	Cargill, Inc.	B006	NOx (lb/mmBtu)	6.49 % DT	6.80 % DT	
1318003059	Medical Center Company	B016	NOx (lb/mmBtu)	8.96 % DT	9.69 % DT	

EAR

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2009	4th Quarter 2008	3rd Quarter 2008
0641090010	Wheeling Pittsburg Steel	B103	H2S (gr/DSCF)	6.11 % EE	15.22 % EE	7.07 % EE
		B104	H2S (gr/DSCF)	6.11 % EE	15.22 % EE	7.07 % EE
		B105	H2S (gr/DSCF)	6.11 % EE	15.22 % EE	7.07 % EE
		B106	H2S (gr/DSCF)	6.11 % EE	15.22 % EE	7.07 % EE
		B107	H2S (gr/DSCF)	6.11 % EE	15.22 % EE	7.07 % EE
		B108	H2S (gr/DSCF)	6.11 % EE	15.22 % EE	7.07 % EE
		P006	H2S (gr/DSCF)	6.11 % EE	15.22 % EE	7.07 % EE
		P007	H2S (gr/DSCF)	6.11 % EE	15.22 % EE	7.07 % EE
		P008	H2S (gr/DSCF)	6.11 % EE	15.22 % EE	7.07 % EE
		P911	H2S (gr/DSCF)	6.11 % EE	15.22 % EE	7.07 % EE
1409090081	Miami University	B010	Opacity	100 % DT	100 % DT	
		B011	Opacity	100 % DT	100 % DT	
		B012	Opacity	100 % DT	100 % DT	

Previous Issues

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2009	4th Quarter 2008	3rd Quarter 2008
0125042608	Ohio State University	B132	NOx (lb/mmBtu)		5.69 % DT	
0145000213	Momentive	SCR1	NOx (lb/hr)			5.12 % DT
0215020233	Waste Technologies Industries	N001	NOx (lb/hr)		5.27 % EE	
			TOC (ppm@7% O2			18.99 % EE
0278000648	Mittal Steel Coke Plant, Warren	P002	H2S (gr/DSCF)		7.74 % EE	
					5.88 % DT	
0302020012	Huskey, Lima Refinery	B026	H2S (gr/DSCF)			7.83 % DT

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2009	4th Quarter 2008	3rd Quarter 2008
		B027	H2S (gr/DSCF)			7.83 % DT
0448020007	BP Oil Company	B005	H2S (gr/DSCF)			6.45 % DT
0641050002	Cardinal Station	B009	Opacity		3.85 % EE	
0684000213	Waterford Energy	P003	NOx (ppm @15% O2)			73.43 % DT
			NOx (lb/hr)			73.43 % DT
0701000007	Stuart Station, DPL	B001	Opacity		10.88 % EE	
		B002	Opacity		7.61 % EE	
0701000060	Killen Station, DPL	B001	SO2 (lb/mmBtu)		5.81 % DT	
1318000245	Lakeshore - CEI	B006	Opacity			5.80 % DT
1413090154	Zimmer - Cinergy	B008	Opacity			5.94 % DT
1413100008	WC Beckjord Station	B005	Opacity		10.92 % DT	
1576000301	Marathon Ashland Refinery	P002	NOx (ppm@0% O2)		8.70 % DT	
			NOx (lb/hr)		8.70 % DT	
1667040085	Kent State University	B006	NOx (lb/mmBtu)			5.53 % DT

EE = CEMS recorded excess emissions
DT =CEMS downtime while emissions unit in operation