



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

5/24/2013

Certified Mail

William Wagner
NORFOLK SOUTHERN RAILWAY COMPANY - WHEELERSBURG
1200 Peachtree St
Box 13
Atlanta, GA 30309

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0773000040
Permit Number: P0091329
Permit Type: Renewal
County: Scioto

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Portsmouth



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
NORFOLK SOUTHERN RAILWAY COMPANY -
WHEELERSBURG**

Facility ID:	0773000040
Permit Number:	P0091329
Permit Type:	Renewal
Issued:	5/24/2013
Effective:	5/24/2013
Expiration:	5/24/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
NORFOLK SOUTHERN RAILWAY COMPANY - WHEELERSBURG

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Authorization

Facility ID: 0773000040
 Application Number(s): A0022698, A0022699, A0022700, A0022701, A0046824
 Permit Number: P0091329
 Permit Description: Administrative Permit Modification to PTI 07-00499 processed as a PTIO renewal for coal storage piles (F002) to correct emission limits due to updated emission factors. Also includes PTIO renewals for plant roadways & parking areas (F004) and coal transloading operations (F003).piles. Combined F001 into F003 per EG 25. Also includes Administrative Modification processes as a PTIO renewal for 5 reciprocating internal combustion engines (B002, B003, B004, B005 and B006) to add BAT requirements in accordance to July 10, 2010 OEPA Memo.
 Permit Type: Renewal
 Permit Fee: \$0.00
 Issue Date: 5/24/2013
 Effective Date: 5/24/2013
 Expiration Date: 5/24/2018
 Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

NORFOLK SOUTHERN RAILWAY COMPANY - WHEELERSBURG
 914 HAYPORT ROAD
 Wheelersburg, OH 45694

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

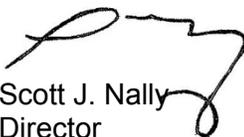
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Portsmouth City Health Dept., Air Pollution Unit
 605 Washington Street
 3rd Floor
 Portsmouth, OH 45662
 (740)353-5156

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


 Scott J. Nally
 Director



Authorization (continued)

Permit Number: P0091329
Permit Description: Administrative Permit Modification to PTI 07-00499 processed as a PTIO renewal for coal storage piles (F002) to correct emission limits due to updated emission factors. Also includes PTIO renewals for plant roadways & parking areas (F004) and coal transloading operations (F003).piles. Combined F001 into F003 per EG 25. Also includes Administrative Modification processes as a PTIO renewal for 5 reciprocating internal combustion engines (B002, B003, B004, B005 and B006) to add BAT requirements in accordance to July 10, 2010 OEPA Memo.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

- Emissions Unit ID: B002**
 Company Equipment ID: B002-H2
 Superseded Permit Number: 07-00589
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: B006**
 Company Equipment ID: B006-BU
 Superseded Permit Number: 07-00589
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: F002**
 Company Equipment ID: Coal Storage Piles
 Superseded Permit Number: 07-00499
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: F003**
 Company Equipment ID: Coal Unloading, Transfer and Conveying and Loading
 Superseded Permit Number: 07-031
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: F004**
 Company Equipment ID: Plant Roadways and Parking
 Superseded Permit Number: 07-031
 General Permit Category and Type: Not Applicable

Group Name: 125 Kw Diesel IC Engines

Emissions Unit ID:	B003
Company Equipment ID:	B003-H1
Superseded Permit Number:	07-00589
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B004
Company Equipment ID:	B004-H3
Superseded Permit Number:	07-00589
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B005
Company Equipment ID:	B005-H4
Superseded Permit Number:	07-00589
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
NORFOLK SOUTHERN RAILWAY COMPANY - WHEELERSBURG
Permit Number: P0091329
Facility ID: 0773000040
Effective Date: 5/24/2013

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Portsmouth City Health Dept., Air Pollution Unit in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
NORFOLK SOUTHERN RAILWAY COMPANY - WHEELERSBURG
Permit Number: P0091329
Facility ID: 0773000040
Effective Date: 5/24/2013

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocation Internal Combustion Engines Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Final Permit-to-Install and Operate
NORFOLK SOUTHERN RAILWAY COMPANY - WHEELERSBURG
Permit Number: P0091329
Facility ID: 0773000040
Effective Date: 5/24/2013

C. Emissions Unit Terms and Conditions



1. B002, B002-H2

Operations, Property and/or Equipment Description:

113 kw (151.5 hp) diesel fired generator (Caterpillar 3304) - Administrative modification to add BAT requirements in accordance with July 10, 2010 OEPA memo.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. Terms c)(2), d)(2), e)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTIO 07-00589, issued 07/1/2008)	Nitrogen oxides (NOx) emissions shall not exceed 4.69 pounds per hour.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	NOx emissions shall not exceed 15.24 tons per rolling, 12 month period.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate matter (PM) shall not exceed 0.33pound per hourand 1.07 tons per rolling, 12 month period. Carbon monoxide (CO) emissions shall not exceed 1.01 pounds per hourand 3.28 tons per rolling, 12 month period. Volatile organic compound (VOC) emissions shall not exceed 0.37 pound per hourand 1.20 tons per rolling, 12



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		month period. Sulfur dioxide (SO ₂) emissions shall not exceed 0.31 pound per hour and 1.01 tons per rolling, 12 month period. See b)(2)a.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
e.	OAC rule 3745-17-11(B)(5)(a)	PM shall not exceed 0.310 pound per million Btu of actual heat input.
f.	OAC rule 3745-17-07(A)	Visible particulate emission (PE) from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM, SO₂, VOC and CO emissions from this air contaminant source since the uncontrolled potential to emit for PM, SO₂, VOC, CO is each less than 10 tons/year.



c) Operational Restrictions

- (1) The permittee shall burn only diesel fuel in this emissions unit.
- (2) The permittee has requested a federally enforceable limitation on operating hours for the purposes of limiting potential to emit to avoid Title V requirements. Therefore, the maximum number of operating hours for this emissions unit shall not exceed 6,500 hours as a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month summation of the hours of operation.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

Term c)(2)
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit.



The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

NO_x emissions shall not exceed 4.69 pounds per hour.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (4.41 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (7.6 gal/hr).

b. Emission Limitation:

NO_x emissions shall not exceed 15.24 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the tons per year emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (4.41 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (7.6 gal/hr), and by the actual hours of operation per rolling, 12-month period, and then dividing by 2000 lbs/ton.

c. Emission Limitation:

PM shall not exceed 0.33 pound per hour and 1.07 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.31 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (7.6 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (0.33 lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.



d. Emission Limitation:

CO emissions shall not exceed 1.01 pounds per hour and 3.28 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.95lb/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (7.6 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (1.01lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.

e. Emission Limitation:

VOC emissions shall not exceed 0.37 pound per hour and 1.20 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.35 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (7.6 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (0.37lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.

f. Emission Limitation:

SO₂ emissions shall not exceed 0.31 pound per hour and 1.01 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.29 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (7.6 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (0.31lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.



g. Emission Limitation:

PE shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.31 lb/million Btu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

h. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group -125 Kw Diesel IC Engines: B003,B004,B005,

EU ID	Operations, Property and/or Equipment Description
B003	125 KW Diesel Fired Generator (Olympian Genset model D125P2) - Administrative modification to add BAT requirements in accordance with July 10, 2010 OEPA memo.
B004	125 KW Diesel Fired Generator (Olympian Genset Model D125P2) - Administrative modification to add BAT requirements in accordance with July 10, 2010 OEPA memo.
B005	125 KW Diesel Fired Generator (Olympian Genset model D100-4 C6.6) - Administrative modification to add BAT requirements in accordance with July 10, 2010 OEPA memo.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. Terms c)(2), d)(2), e)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTIO 07-00589, issued 07/1/2008)	Nitrogen oxides (NOx) emissions shall not exceed 6.11 pounds per hour.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	NOx emissions shall not exceed 19.86 tons per rolling, 12 month period.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate matter (PM) shall not exceed 0.43 pound per hour and 1.40 tons per rolling, 12 month period. Carbon monoxide (CO) emissions shall not exceed 1.32 pounds per hour and 4.29



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		tons per rolling, 12 month period. Volatile organic compound (VOC) emissions shall not exceed 0.49 pound per hour and 1.59 tons per rolling, 12 month period. Sulfur dioxide (SO ₂) emissions shall not exceed 0.40 pound per hour and 1.30 tons per rolling, 12 month period. See b)(2)a.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
e.	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions (PE) shall not exceed 0.310 pound per million Btu of actual heat input.
f.	OAC rule 3745-17-07(A)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.



- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM, SO₂, VOC and CO emissions from this air contaminant source since the uncontrolled potential to emit for PM, SO₂, VOC, CO is each less than 10 tons/year.

- c) **Operational Restrictions**

- (1) The permittee shall burn only diesel fuel in this emissions unit.
- (2) The permittee has requested a federally enforceable limitation on operating hours for the purposes of limiting potential to emit to avoid Title V requirements. Therefore, the maximum number of operating hours for this emissions unit shall not exceed 6,500 hours as a rolling, 12-month summation.

- d) **Monitoring and/or Recordkeeping Requirements**

- (1) For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month summation of the hours of operation.

- e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

Term c)(2)
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.



The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency)..

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

NOx emissions shall not exceed 6.11 pounds per hour.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (4.41 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (9.9 gal/hr).

b. Emission Limitation:

NOx emissions shall not exceed 19.86 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the tons per year emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (4.41 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (9.9 gal/hr), and by the actual hours of operation per rolling, 12-month period, and then dividing by 2000 lbs/ton.

c. Emission Limitation:

PM shall not exceed 0.43 pound per hour and 1.40 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.31



lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (9.9 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (0.43lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.

d. Emission Limitation:

CO emissions shall not exceed 1.32 pounds per hour and 4.29 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.95 lb/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (9.9 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (1.32lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.

e. Emission Limitation:

VOC emissions shall not exceed 0.49 pound per hour and 1.59 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.35 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (9.9 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (0.49lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.

f. Emission Limitation:

SO₂ emissions shall not exceed 0.40 pound per hour and 1.30 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.29



lb/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (9.9 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (0.40lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.

g. Emission Limitation:

PE shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.31 lb/million Btu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

h. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



3. B006, B006-BU

Operations, Property and/or Equipment Description:

160 KW Diesel Fired Generator (Holt Caterpillar Model 3208) - Administrative modification to add BAT requirements in accordance with July 10, 2010 OEPA memo.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. Terms c)(2), d)(2), e)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTIO 07-00589, issued 07/1/2008)	Nitrogen oxides (NOx) emissions shall not exceed 6.67 pounds per hour.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	NOx emissions shall not exceed 21.68 tons per rolling, 12 month period.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate matter (PM) shall not exceed 0.47 pound per hour and 1.53 tons per rolling, 12 month period. Carbon monoxide (CO) emissions shall not exceed 1.44 pounds per hour and 4.68 tons per rolling, 12 month period. Volatile organic compound (VOC) emissions shall not exceed 0.53 pound per hour and 1.72 tons per rolling, 12



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		month period. Sulfur dioxide (SO ₂) emissions shall not exceed 0.44 pound per hour and 1.43 tons per rolling, 12 month period. See b)(2)a.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
e.	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions (PE) shall not exceed 0.310 pound per million Btu of actual heat input.
f.	OAC rule 3745-17-07(A)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM, SO₂, VOC and CO emissions from this air



contaminant source since the uncontrolled potential to emit for PM, SO₂, VOC, CO is each less than 10 tons/year.

c) Operational Restrictions

- (1) The permittee shall burn only diesel fuel in this emissions unit.
- (2) The permittee has requested a federally enforceable limitation on operating hours for the purposes of limiting potential to emit to avoid Title V requirements. Therefore, the maximum number of operating hours for this emissions unit shall not exceed 6,500 hours as a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month summation of the hours of operation.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

Term c)(2)
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).



- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

NOx emissions shall not exceed 6.67 pounds per hour.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (4.41 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (10.8 gal/hr).

- b. Emission Limitation:

NOx emissions shall not exceed 21.68 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the tons per year emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (4.41 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (10.8 gal/hr), and by the actual hours of operation per rolling, 12-month period, and then dividing by 2000 lbs/ton.

- c. Emission Limitation:

PM shall not exceed 0.47 pound per hour and 1.53 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.31 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (10.8 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (0.47 lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.



d. Emission Limitation:

CO emissions shall not exceed 1.44 pounds per hour and 4.68 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.95 lb/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (10.8 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (1.44 lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.

e. Emission Limitation:

VOC emissions shall not exceed 0.53 pound per hour and 1.72 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.35 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (10.8 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (0.53 lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.

f. Emission Limitation:

SO₂ emissions shall not exceed 0.44 pound per hour and 1.43 tons per rolling, 12 month period.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.29 lbs/mmBtu) by the maximum diesel fuel heat content (0.14 mmBtu/gal), and by the maximum fuel use of the emissions unit (10.8 gal/hr).

Compliance with the tons per rolling, 12 month period emission limitation shall be demonstrated by multiplying the short-term allowable PM emission limitation (0.44 lb/hr) by the maximum number of hours of operation per rolling, 12-month period (6500 hours), and then dividing by 2,000 pounds per ton.



g. Emission Limitation:

PE shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.31 lb/million Btu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

h. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



4. F002, Coal Storage Piles

Operations, Property and/or Equipment Description:

Coal Storage Piles Controlled by Water Cannons: Administrative modification processed as a renewal with updated emissions factors.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 07-00499, issued 04/23/2002)	Fugitive particulate emissions (PE) shall not exceed 165.02 tons per year (tpy). Fugitive particulate emissions of less than 10 microns (PM10) shall not exceed 43.36 tpy. load-in and load-out of storage piles There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period. best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see b)(2)b., b)(2)c. and b)(2)g.) wind erosion from storage piles



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period.</p> <p>best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see b)(2)d., b)(2)f. and b)(2)g.).</p> <p>operation of vehicles on top of storage piles, excluding emissions from the combustion of fuels in such vehicles (i.e., pile working)</p> <p>There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period.</p> <p>best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see b)(2)e., b)(2)f. and b)(2)g.).</p>

(2) Additional Terms and Conditions

- a. The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

all coal storage piles
- b. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to minimizing drop height and watering to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.



- d. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the pile surfaces with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ best available control measures on all pile working operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the pile surfaces with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The above-mentioned control measure(s) shall be employed for each pile working operation and wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) The annual throughput of the facility shall not exceed 10,000,000 tons.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	daily

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	daily



(3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	daily

(4) Except as otherwise provided in this section, the permittee shall perform inspections of the pile working operation associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	daily

(5) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(6) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, pile working operations, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

(7) The permittee may, upon receipt of written approval from the Portsmouth Local Air Agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

(8) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in (8)d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, (iii) the storage pile working operations,



and (iv) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- (9) The permittee shall maintain monthly records of the coal received at the coal transfer facility.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Fugitive particulate emissions (PE) shall not exceed 165.02 tons per year.

- Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i. through iv below:

- i. Load-in and load-out emissions - Emissions shall be calculated by multiplying the maximum load-in rate (tons) times the particulate emission factor in pounds per ton times the control efficiency of 90% for minimizing drop height with the stacker and 75% (RACM, Table 2.1.2-8, dated 10/80) for wet suppression for material loaded in via truck. The particulate emission factor shall be calculated using the following equation and control efficiency of 90% from "Estimating Fugitive Emissions from Coal Export Terminals" presented at the APCA Specialty Conference on Fugitive Dust Issues in the Coal Use Cycle, Pittsburgh, PA, April 1983):

$$EF \text{ (pounds per ton)} = 0.0018 (s/5) (U/5) (h/10) / (m/2)^2 (.22)$$

where:

s = silt content (%)

U = mean wind speed (mph)

m = material moisture content (%)

h = drop height (feet)



PM10 emissions are 22% of the PM emissions (from "Determination of Fugitive Dust Emissions from Rotary Railcar Dumping")

ii. Wind erosion emissions - Emissions shall be calculated by multiplying the maximum storage capacity of the facility tons per hour times the uncontrolled particulate emission factor of 0.000012 pounds per hour per ton times a 90% (Estimating Fugitive Emissions from Coal Export Terminals" presented at the APCA Specialty Conference on Fugitive Dust Issues in the Coal Use Cycle, Pittsburgh, PA, April 1983) control efficiency for watering. The uncontrolled particulate emission factor was calculated from the results of a Simpson Weather Associates Study of the Wheelersburg terminal.

iii. Pile working emissions (front end loader traffic on and around piles) - Emissions shall be calculated by multiplying the vehicle miles traveled (VMT) times the particulate emission factor in pounds per vehicle mile traveled times the control efficiency of 80% (RACM, Table 2.1.2-8, dated 10/80) for wet suppression. The particulate emission factor shall be calculated using the following equation from AP-42, Volume I, 5th Edition, Chapter 13, Section 13.2.2, dated November 2006:

$$EF \text{ (pounds per VMT)} = k (s/12)^a (W/3)^b (365-p/365)$$

where:

k = particle size multiplier (4.9 for PE)

a = constant (0.7 for PE)

b = constant (0.45 for PE)

s = silt content of road surface material (%)

W = average vehicle weight (tons)

M = surface material moisture content under dry normal conditions (%)

p = number of days with at least 0.01 inches of precipitation

iv. Pile working emissions (dozing of piles) - Emissions shall be calculated by multiplying the time spent bulldozing piles in hours times the particulate emission factor in pounds per hour times the control efficiency of 80% (RACM, Table 2.1.2-8, dated 10/80) for wet suppression. The particulate emission factor shall be calculated using the following equation from AP-42, Volume I, 5th Edition, Chapter 11, Section 11.9, Table 11.9-1, dated October 1998.



$$EF \text{ (pounds per hour)} = 78.4(s)^{1.2}/(M)^{1.3}$$

where:

s = material silt content (%)

M = material moisture content (%)

b. Emission Limitation:

Fugitive PM10 emissions shall not exceed 66.64 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of i. through iv below:

i. Load-in and load-out emissions - Emissions shall be calculated by multiplying the maximum load-in rate (tons) times the particulate emission factor in pounds per ton times the control efficiency of 90% for minimizing drop height with the stacker and 75% (RACM, Table 2.1.2-8, dated 10/80) for wet suppression for material loaded in via truck. The particulate emission factor shall be calculated using the following equation and control efficiency of 90% from "Estimating Fugitive Emissions from Coal Export Terminals" presented at the APCA Specialty Conference on Fugitive Dust Issues in the Coal Use Cycle, Pittsburgh, PA, April 1983):

$$ii. EF \text{ (pounds per ton)} = 0.0018(s/5) (U/5) (h/10) / (m/2)^2$$

where:

s = silt content (%)

U = mean wind speed (mph)

m = material moisture content (%)

h = drop height (feet)

iii. Wind erosion emissions - Emissions shall be calculated by multiplying the maximum storage capacity of the facility tons per hour times the uncontrolled PM10 emission factor of 0.0000061 pounds per hour per ton times a 90% (Estimating Fugitive Emissions from Coal Export Terminals" presented at the APCA Specialty Conference on Fugitive Dust Issues in the Coal Use Cycle, Pittsburgh, PA, April 1983) control efficiency for watering. The uncontrolled particulate emission factor was calculated from the results of a Simpson Weather Associates Study of the Wheelersburg terminal.

iv. Pile working emissions (front end loader traffic on and around piles) - Emissions shall be calculated by multiplying the vehicle miles traveled (VMT) times the particulate emission factor in pounds per vehicle mile



traveled times the control efficiency of 80% (RACM, Table 2.1.2-8, dated 10/80) for wet suppression. The particulate emission factor shall be calculated using the following equation from AP-42, Volume I, 5th Edition, Chapter 13, Section 13.2.2, dated November 2006:

$$EF \text{ (pounds per VMT)} = k (s/12)^a (W/3)^b (365-p/365)$$

where:

k = particle size multiplier (1.5 for PM10)

a = constant (0.9 for PM10)

b = constant (0.45 for PM10)

s = silt content of road surface material (%)

W = average vehicle weight (tons)

M = surface material moisture content under dry normal conditions (%)

p = number of days with at least 0.01 inches of precipitation

- v. Pile working emissions (dozing of piles) - Emissions shall be calculated by multiplying the time spent bulldozing piles in hours times the particulate emission factor in pounds per hour times the control efficiency of 80% (RACM, Table 2.1.2-8, dated 10/80) for wet suppression. The particulate emission factor shall be calculated using the following equation from AP-42, Volume I, 5th Edition, Chapter 11, Section 11.9, Table 11.9-1, dated October 1998.

$$EF \text{ (pounds per hour)} = 0.75 * 18.6 * (s)^{1.5} / (M)^{1.4}$$

where:

s = material silt content (%)

M = material moisture content (%)

- c. Emission Limitation:

There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period from load-in or load-out operations.

There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period from wind erosion.

There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period from pile working operations.



Applicable Compliance Method:

If required, compliance with the visible PE limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

- (1) None.



5. F003, Coal Unloading, Transfer and Conveying and Loading

Operations, Property and/or Equipment Description:

Coal Unloading, Transfer and Conveying and Loading to Railcar and Barge

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 07-031, issued 07/24/1978)	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see b)(2)a through b)(2)e)

(2) Additional Terms and Conditions

a. The material handling operation(s) covered by this permit and subject to the above-mentioned requirements are listed below:

- Rotary Rail Car Dumper to dumper pan (F003-T1)
- Dumper pan transfer to Conveyor #1 (F003-T2)
- Transfer from Conveyor #1 to Conveyor #2 (F003-T3)
- Transfer from Conveyor #2 to Stacker (F003-T4)
- Transfer from Conveyor #2 to Conveyor #3 (F003-T5)
- Transfer from Conveyor #3 to Conveyor #4 (F003-T6)
- Transfer from Conveyor #3 to railcar (F003-T7)



- Transfer from Conveyor #3 to Barge (F003-T8)
 Transfer from Reclaim Hoppers #1-8 to Conveyor #2 (F003-T9)
- b. The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

Material handling operation(s)	Control measure(s)
Rotary Rail Car Dumper to dumper pan (F003-T1)	enclosure & water spray
Dumper pan transfer to Conveyor #1 (F003-T2)	enclosure & water spray
Transfer from Conveyor #1 to Conveyor #2 (F003-T3)	enclosure & water spray
Transfer from Conveyor #2 to Stacker (F003-T4)	enclosure& water spray
Transfer from Conveyor #2 to Conveyor #3 (F003-T5)	enclosure& water Spray
Transfer from Conveyor #3 to Conveyor #4 (F003-T6)	enclosure& water spray
Transfer from Conveyor #3 to railcar (F003-T7)	enclosure& water spray
Transfer from Conveyor #3 to barge(F003-T8)	Telescopic chute
Transfer from Reclaim Hoppers #1 - 8 to Conveyor #2 (F003-T9)	enclosure& water spray

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.



- d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit are appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

 - c) Operational Restrictions
 - (1) None.

 - d) Monitoring and/or Recordkeeping Requirements
 - (1) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
all	daily, when in operation

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. The inspections shall be performed during representative, normal operating conditions.
 - (2) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in (3)d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
-
- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. None

g) Miscellaneous Requirements

(1) None.



6. F004, Plant Roadways and Parking

Operations, Property and/or Equipment Description:

Paved and Unpaved Roadways and Parking Areas

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) **Applicable Emissions Limitations and/or Control Requirements**
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 07-031, issued 07/24/1978)	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see b)(2)a through b)(2)e.

- (2) **Additional Terms and Conditions**
 - a. The permittee shall employ best available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
 - b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of



this permit. Implementation of the control measures shall not be necessary for paved and unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

- c. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- d. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>roadways and parking areas</u>	<u>minimum inspection frequency</u>
all paved and unpaved roadways and parking areas	daily

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- (3) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;



- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented;
- d. and on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in (3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. None

g) Miscellaneous Requirements

- (1) None.