



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

10/22/2013

Drew Johnson  
Midwest Terminals of Toledo, Inc.  
383 W. Dussell Drive  
Maumee, OH 43537

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0448011928  
Permit Number: P0114434  
Permit Type: Initial Installation  
County: Lucas

Certified Mail

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

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](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.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](http://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 Toledo Department of Environmental Services at (419)936-3015 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: TDES



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Midwest Terminals of Toledo, Inc.**

Facility ID:	0448011928
Permit Number:	P0114434
Permit Type:	Initial Installation
Issued:	10/22/2013
Effective:	10/22/2013
Expiration:	10/22/2023





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Midwest Terminals of Toledo, Inc.

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**Final Permit-to-Install and Operate**  
Midwest Terminals of Toledo, Inc.  
**Permit Number:** P0114434  
**Facility ID:** 0448011928  
**Effective Date:** 10/22/2013

## Authorization

Facility ID: 0448011928  
Application Number(s): A0047649  
Permit Number: P0114434  
Permit Description: New installation for unpaved roadways, material handling and storage piles at the Ironville Facility on Front St.  
Permit Type: Initial Installation  
Permit Fee: \$1,650.00  
Issue Date: 10/22/2013  
Effective Date: 10/22/2013  
Expiration Date: 10/22/2023  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Midwest Terminals of Toledo, Inc.  
2863 Front St  
Toledo, OH 43605

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:

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

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



**Final Permit-to-Install and Operate**  
Midwest Terminals of Toledo, Inc.  
**Permit Number:** P0114434  
**Facility ID:** 0448011928  
**Effective Date:** 10/22/2013

## Authorization (continued)

Permit Number: P0114434  
Permit Description: New installation for unpaved roadways, material handling and storage piles at the Ironville Facility on Front St.

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

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	Unpaved Roadways
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	Material Conveying
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Storage Piles
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Midwest Terminals of Toledo, Inc.  
**Permit Number:** P0114434  
**Facility ID:** 0448011928  
**Effective Date:** 10/22/2013

## **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 Toledo Department of Environmental Services 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 submitting<sup>1</sup> 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.

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<sup>1</sup> 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**  
Midwest Terminals of Toledo, Inc.  
**Permit Number:** P0114434  
**Facility ID:** 0448011928  
**Effective Date:** 10/22/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

Midwest Terminals of Toledo, Inc.

**Permit Number:** P0114434

**Facility ID:** 0448011928

**Effective Date:** 10/22/2013

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.



**Final Permit-to-Install and Operate**  
Midwest Terminals of Toledo, Inc.  
**Permit Number:** P0114434  
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**Effective Date:** 10/22/2013

## **C. Emissions Unit Terms and Conditions**



**1. F001, Unpaved Roadways**

**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), as effective 11/30/2001	work practice standards that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust  see b)(2)a. and b)(2)e. through b)(2)i., and d)(1) through d)(3)
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	see b)(2)b. and b)(2)c.
c.	OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.
d.	OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-08(B)	see b)(2)e. through b)(2)i.

(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.
- c. "The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions from this air contaminant source since the calculated annual emission rate for PM10 is less than 10 tons per year taking into account the federally enforceable requirements of OAC rule 3745-17-07(B)(4), OAC rule 3745-17-07(B)(5), and OAC rule 3745-17-08(B).
- d. The paved and unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:  
  
all paved and unpaved roadways and parking areas.
- e. The permittee shall employ best available control measures on all paved and unpaved roadways and parking areas for the purpose of minimizing or eliminating visible emissions of fugitive dust. The permittee has committed to watering, flushing, and/or or application of suitable dust suppressant chemicals at sufficient treatment frequencies to minimize or eliminate visible emissions of fugitive dust, and restricting the maximum speed limit on paved and unpaved roadways to 15 miles per hour. Nothing in this paragraph shall prohibit the permittee from employing other control measures to minimize or eliminate visible emissions of fugitive dust.
- f. Any paved and unpaved roadway or parking area which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using appropriate dust control measures for paved surfaces. Any unpaved roadway or



parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to visible emissions limitations for paved roadways.

- g. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, 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.
- h. 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.
- i. 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 and reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall water the paved and unpaved roadways and parking areas once daily, or more frequently on days where the permittee observes that more frequent application of water is necessary to minimize or eliminate visible emissions of fugitive dust. The permittee is not required to water on days where inspections are not necessary as described in d)(3).

- (2) 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>
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allpaved and unpaved roads and parking areas	daily
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- (3) The purpose of the inspections is to determine the need for watering more frequently or implementing additional control measures identified in b)(2)e. 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 minimize or eliminate visible emissions of fugitive dust. No inspection is required on any day that the road is not used. 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.



- (4) The permittee shall maintain records of the following information:
- a. date, identification of control measures implemented, and location control measures were implemented each day;
  - b. the reason why the paved and unpaved roadways were not watered daily;
  - c. 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, or lack of road use; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where inspections were not required due to snow and/or ice cover, or precipitation were sufficient to not require the control measures, or the roadways and parking areas were not in use.
- (5) The information required in Term d)(4)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 District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify any of the following occurrences in the annual permit evaluation report:
- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation or the roadways and parking areas not being in use; and
  - b. each day when the paved and unpaved roadways and parking areas were required to be watered, but were not watered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:  
  
No visible particulate emissions from paved roadways and parking areas except for a period of time not to exceed six minutes during any 60-minute observation period. No visible particulate emissions from unpaved roadways and parking



**Final Permit-to-Install and Operate**

Midwest Terminals of Toledo, Inc.

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areas except for a period of time not to exceed thirteen minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation listed 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") and the modifications specified in OAC rule 3745-17-03(B)(4).

g) Miscellaneous Requirements

- (1) None.



**2. F002, Material Conveying**

**Operations, Property and/or Equipment Description:**

Material handling - bulk materials are unloaded from barges and ships by self-unloading boom into a hopper and then transferred by conveyors to storage piles, and bulk materials are loaded out of the facility to rail cars or trucks.

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.	ORC 3704.03(T)	Visible particulate emissions shall not exceed 20 percent opacity as a three-minute average.
b.	OAC rule 3745-17-07(B)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to ORC 3704.03(T).
c.	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust  see b)(2)b. through b)(2)d.



(2) Additional Terms and Conditions

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

unloading from barges and ships by self-unloading boom into a hopper;  
 transfer from hopper to conveyor;  
 conveying and conveyor transfer points; and  
 truck and rail car loading.

- b. The permittee shall employ reasonably 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:

<u>material handling operation(s)</u>	<u>material handling operation(s)</u>
unloading ship to hopper, hopper transfer to conveyor, conveying, and conveyor transfer points	partial enclosures and/or water sprays
truck loading and rail car loading	wet suppression

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 is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
unloading ship to hopper, hopper transfer to conveyor, conveying, conveyor transfer points	once per day on any day the material handling operation is in use
truck loading	once per day on any day the material handling operation is in use
rail car loading	once per day on any day the material handling operation is in use

- (2) The above-mentioned inspections shall be performed during representative, normal operating conditions.
- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or 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.
- (4) 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.
- (5) The information in (4)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 District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.



- (2) The permittee shall identify any of the following occurrences in the annual permit evaluation report:
  - a. each day during which an inspection was not performed by the required frequency; and
  - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
- f) **Testing Requirements**
  - (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
    - b. The emission testing shall be conducted to demonstrate compliance with the allowable visible emissions limitation when unloading each of the following materials: pelletized iron ore, petroleum coke, and crushed stone. The fugitive emissions points required to be tested include: unloading from ship to hopper; transfer from hopper to conveyor; and, each conveyor transfer point.

If the permittee does not unload one or more of the above materials during the time period specified in f)(1)a., then the permittee shall conduct testing for those materials during the next scheduled delivery.
    - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 9 of 40 CFR Part 60, Appendix A and the modifications listed in OAC rule 3745-17-03(B)(3)(a) and (B)(3)(b).

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
    - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
    - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental



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Services. The Notification of Intent to Test may be submitted with less than 30 days advance notification if the permittee's proposed testing date is agreed to by the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.



**3. F003, Storage Piles**

**Operations, Property and/or Equipment Description:**

Storage piles including load-in, load-out, wind erosion, and front-end loader traffic around the piles

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.	ORC 3704.03(T)	work practice standards that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust  see b)(2)a. through b)(2)g. and d)(1) through d)(6)
b.	OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from front-end loader traffic on paved areas, except for a period of time not to exceed six minutes during any sixty-minute observation period.
c.	OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from front-end loader traffic on unpaved areas, except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
d.	OAC rule 3745-17-07(B)(6)	There shall be no visible particulate



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions from any material storage pile, except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
e.	OAC rule 3745-17-08(B)	see b)(2)a. through b)(2)g.

(2) Additional Terms and Conditions

- a. 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 minimizing or eliminating visible emissions of fugitive dust. In accordance with the permittee's application, the permittee has committed to minimize or eliminate visible emissions of fugitive dust by maintaining minimal drop heights for stackers and front-loaders, and using water sprays, wet suppression and/or chemical suppression at sufficient treatment frequencies to minimize or eliminate visible emissions of fugitive dust, and restricting front-end loader speed to a maximum of 15 miles per hour.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to minimize or eliminate visible emissions of fugitive dust.

- b. 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 minimize or eliminate visible emissions of fugitive dust. 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.
- c. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of minimizing or eliminating visible emissions of fugitive dust. In accordance with the application, the permittee has committed to perform one or more of the following: (chemical stabilization, watering/sprinkling systems/hoses, covering the storage piles) to minimize or eliminate visible emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to minimize or eliminate visible emissions of fugitive dust.
- d. The above-mentioned control measure(s) shall be employed for 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 minimize or eliminate visible emissions of fugitive dust. 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 minimize or eliminate visible emissions of fugitive dust.



- e. The permittee shall employ best available control measures for loader traffic around the storage piles for the purpose of minimizing or eliminating visible emissions of fugitive dust. In accordance with the application, the permittee has committed to perform watering to minimize or eliminate visible emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to minimize or eliminate visible emissions of fugitive dust.
- f. The above-mentioned control measure(s) shall be employed daily for loader traffic around the storage piles, unless if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the more frequent implementation of the control measure(s) is necessary to minimize or eliminate visible emissions of fugitive dust. Implementation of the control measure(s) shall not be necessary for front-end loader travel emissions on days that there is no front-end loader traffic or when the areas where the front-end loader travels is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day minimize or eliminate visible emissions of fugitive dust.
- 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 best available technology requirements of ORC 3704.03(T) and OAC rule 3745-17-08 reasonably available control technology requirements.

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 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, on any day during which materials are loaded-in to a storage pile

- (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-out inspection frequency</u>
all	daily, on any day during which materials are loaded-out from a storage pile

- (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:



storage pile identification      minimum wind erosion inspection frequency

all                                      daily

- (4) Except as otherwise provided in this section, the permittee shall perform inspections of the front-end loader traffic around the storage piles daily. No inspection shall be necessary for front-end loader traffic emissions on days when there is no front-end loader traffic. No inspection shall be necessary for front-end loader travel areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust.
- (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 minimize or eliminate visible emissions of fugitive dust. 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, and wind erosion from the surface of a storage pile, and front-end loader traffic in order to minimize or eliminate visible emissions of fugitive dust. The inspections shall be performed during representative, normal storage pile and front-end loader operating conditions.
- (7) The permittee shall maintain records of the following information:
  - a. date, identification of control measures implemented, and location control measures were implemented each day;
  - b. the reason why the front-end loader travel areas were not watered daily;
  - c. 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, or no front-end loader traffic; and
  - d. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - e. on a calendar quarter basis, the total number of days the control measures were implemented, and for wind erosion from pile surfaces and front-end loader traffic, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).
- (8) The information required in (7)e. shall be kept separately for (i) the load-in operations, (ii) the load-out operations (iii) the pile surfaces (wind erosion), and (iv) the front-end loader traffic, 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 District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify any of the following occurrences in the annual permit evaluation report:
  - a. date, identification of control measures implemented, and location control measures were implemented each day;
  - b. the reason why the paved and unpaved roadways were not watered daily
  - c. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation or the lack of front-end loader traffic; and
  - d. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

There shall be no visible particulate emissions except for a period of time not to exceed thirteen minutes in any 60-minute observation period from load-in and load-out. There shall be no visible particulate emissions except for a period of time not to exceed thirteen minutes in any 60-minute observation period from wind erosion.

There shall be no visible particulate emissions except for a period of time not to exceed six minutes in any 60-minute observation period from front-end loader traffic on paved areas. There shall be no visible particulate emissions except for a period of time not to exceed thirteen minutes in any 60-minute observation period from front-end loader traffic on unpaved areas.

Applicable Compliance Method:

Compliance with the visible particulate emissions limitations shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in



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40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and the modifications specified in OAC rule 3745-17-03(B)(4).

g) Miscellaneous Requirements

(1) None.