

Facility ID: 0679020004 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0679020004 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Coal preparation plant with a natural gas (startup) and coal fine-fired thermal coal dryer, controlled by a cyclone and a mist eliminator	OAC rule 3745-35-07	Particulate emissions shall not exceed 411 pounds per day nor 75.2 tons per year.
	OAC rule 3745-17-11	Emissions of sulfur dioxide shall not exceed 181 pounds per day nor 33.1 tons per year.
	OAC rule 3745-18-06	Particulate emissions shall not exceed 47.1 pounds per hour from the stack. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07.
	OAC rule 3745-17-07	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07. Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

**2. Additional Terms and Conditions**

- (a) The permittee shall take reasonable precautions, at all times, to prevent particulate matter from becoming airborne. Such precautions shall include:
  - i. The application of water or other suitable dust suppressants on roads and driveways in the facility.
  - ii. Maintaining the present dust suppression system on all coal conveyor transfer points within the building so as to minimize the emission of fugitive dust from the building.
  - iii. Promptly patching any leaks which occur in the building or storage silos.
  - iv. Adopting a policy by the company whereby coal will not be unloaded from or loaded into trucks which are consistently being used without truck coverings over exposed loads.

**B. Operational Restrictions**

1. The air pressure at the inlet to the mist eliminator shall be continuously maintained between 10 and 15 inches of water at all times while the emissions unit is in operation, except during calibration and maintenance activities, as noted on the recorder chart.
2. The water pressure in the line supplying water to the mist eliminator shall be continuously maintained between 20 and 30 pounds per square inch at all times while the emissions unit is in operation, except during calibration and maintenance activities, as noted on the recorder chart.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the air pressure at the inlet to the mist eliminator and the water pressure in the line supplying water to the mist eliminator while the emissions unit is in operation. These monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturers' recommendations, instructions and operating manuals.
  2. The permittee shall maintain daily records of the following information:
    - a. the hours of operation;
    - b. the calculated particulate emission rate, in pounds per day, i.e., [the emission rate from the latest emission test, in pounds per hour] x [the hours of operation for the day]; and
    - c. the calculated sulfur dioxide emission rate, in pounds per day, i.e., [the emission rate from the latest emission test, in pounds per hour] x [the hours of operation for the day].
  3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to eliminate the visible emissions.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation reports that identify all periods of time during which the air pressure at the inlet to the mist eliminator and/or the water pressure in the line supplying water to the mist eliminator were not maintained within the ranges specified in Sections B.1 and B.2 of this permit. These reports shall be submitted to the Ohio EPA, SEDO by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
  2. The permittee shall submit quarterly deviation reports that identify each day that exceeded the daily emission limitation[s] for particulates and/or sulfur dioxide. These reports shall be submitted to the Ohio EPA, SEDO by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
  3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, SEDO by January 31 and July 31 of each year and shall cover the previous 6-month period.
  4. The permittee shall submit annual reports that specify the actual emissions of particulates and sulfur dioxide from this emissions unit. Each report shall be submitted to the Ohio EPA, SEDO by January 31 of each year and shall cover the previous calendar year.
- E. Testing Requirements**
1. Compliance with the 411 pounds of particulate emissions per day limitation shall be determined by multiplying the particulate emission rate documented by the most recent stack test, in pounds per hour, by the daily operating hours.
  2. Compliance with the 181 pounds of sulfur dioxide per day limitation shall be determined by multiplying the sulfur dioxide emission rate documented by the most recent stack test, in pounds per hour, by the daily operating hours.
  3. Compliance with the annual particulate and sulfur dioxide emission limitations shall be determined by multiplying the particulate and sulfur dioxide emission rates documented by the most recent stack test[s], in pounds per hour, by the annual operating hours, and then dividing by 2000.
  4. 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 6 months of permit issuance.
    - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates and sulfur dioxide.
    - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1 through 5 of 40 CFR Part 60, Appendix A for particulates; and Methods 1 through 4, and 6 of 40 CFR Part 60, Appendix A for sulfur dioxide. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
    - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, SEDO.  
Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, SEDO. 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, SEDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, SEDO 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.

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 Ohio EPA, SEDO 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 Ohio EPA, SEDO.

5. If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9, and OAC rule 3745-17-03(B)(1).

**F. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-35-07(B)(2), all the terms and conditions of this permit to operate are federally enforceable. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.
2. Potential to emit (PTE) calculations, using conservative estimates, have been performed for PM10 emissions from all other operations at this facility. Specifically, these include: haul roads and other flat areas not normally subject to traffic, material transfer and conveying operations, coal storage piles, and crushing and screening operations. The total PTE has been determined to be 23.6 tons per year for these emissions units.