John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

1/13/2014

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	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

RONALD HODEL
CINCINNATI BULK TERMINALS LLC
895 W MEHRING WAY
CINCINNATI, OH 45203

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431072121
Permit Number: P0115621
Permit Type: Administrative Modification
County: Hamilton

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/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 by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: SWOAQA

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
CINCINNATI BULK TERMINALS LLC

Facility ID:	1431072121
Permit Number:	P0115621
Permit Type:	Administrative Modification
Issued:	1/13/2014
Effective:	1/13/2014
Expiration:	11/26/2018

Division of Air Pollution Control
Permit-to-Install and Operate
for
CINCINNATI BULK TERMINALS LLC

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Authorization

Facility ID:	1431072121
Application Number(s):	A0049037
Permit Number:	P0115621
Permit Description:	Administrative modification to PTIO P0110515 and P0098501 for barge docks and railcar operations and material handling (emissions units F011, F012, F013 and F017) for updated emission factors and operational flexibility at the facility.
Permit Type:	Administrative Modification
Permit Fee:	$2,500.00
Issue Date:	1/13/2014
Effective Date:	1/13/2014
Expiration Date:	11/26/2018

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

CINCINNATI BULK TERMINALS LLC
895 W. MEHRING WAY
Cincinnati, OH 45203

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:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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

Craig W. Butler
Interim Director

Authorization (continued)

Permit Number: P0115621
Permit Description: Administrative modification to PTIO P0110515 and P0098501 for barge docks and railcar operations and material handling (emissions units F011, F012, F013 and F017) for updated emission factors and operational flexibility at the facility.

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

Emissions Unit ID:	**F011**
Company Equipment ID:	Barge Unloading (East)
Superseded Permit Number:	P0110515
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F012**
Company Equipment ID:	Barge Unloading (Mid)
Superseded Permit Number:	P0110515
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F013**
Company Equipment ID:	Barge Loading, Unloading and Material Handling (West)
Superseded Permit Number:	P0110515
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F017**
Company Equipment ID:	Material Handling, Railcar
Superseded Permit Number:	P0098501
General Permit Category and Type:	Not Applicable

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 [DO/LAA] 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 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 emission 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 beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

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.

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 following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and Y, Standards of Performance for Coal Preparation and Processing Plants (NSPS): F012, F013, and F017. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

C. Emissions Unit Terms and Conditions

1. F011, Barge Unloading (East)

Operations, Property and/or Equipment Description:

Barge unloading (East Dock)

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. b)(1)b., c)(2), d)(4), e)(2), f)(1)c. and f)(1)d.

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(F) Voluntary Limitation	Particulate emissions (PE) shall not exceed 6.6 pounds per hour. Particulate emissions 10 microns in diameter and less (PM10) shall not exceed 3.1 pounds per hour. See c)(1).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Annual combined PE from F011, F012, and F013 shall not exceed 28.6 tons per year, based on a rolling, 12-month summation. Annual combined PM10 emissions from F011, F012, and F013 shall not exceed 13.5 tons per year, based on a rolling, 12-month summation. See c)(2).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	See b)(2)a.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures for the above-identified material handling operations 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 measures to ensure compliance:

i. The permittee shall minimize all drop heights (from the clam shell, conveyors, etc.). The releasing of material into the receiving hopper from the clam shell barge unloader shall take place only when the opening of the clam shell unloader is below the edge of the receiving hopper in order to minimize or eliminate visible emissions of fugitive dust.

ii. The permittee shall enclose all conveyors in order to minimize or eliminate visible emissions of fugitive dust.

iii. The permittee shall apply a suitable dust suppressant, as outlined in the application for this Permit to Install and Operate (PTIO). The dust suppressant shall be applied as needed to minimize or eliminate fugitive dust emissions.

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 rules 3745-17-08. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The hourly PE and PM10 emission limitations outlined in b)(1) are based upon a worst case uncontrolled emission factors for limestone handling pursuant to US EPA AP-42, Table 13.2.4-1 (0.1314 lb PE/ton of limestone transferred and 0.062 lb PM10/ton of limestone transferred), the maximum rated capacity of the equipment, and the control requirements outlined in this permit, and represents the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.

In accordance with the application for this PTIO, this emissions unit may receive and/or transfer other materials so long as the applicable emission factor and calculated emission limitations do not exceed the emission limitations specified in b)(1). The permittee shall comply with the record keeping requirements in d)(4) regarding the type of material(s) received.

c. Best Available Technology (BAT) is not required because the air contaminate source was installed on or before January 1, 1974.

c) Operational Restrictions

(1) This emissions unit shall not operate in excess of its maximum rated hourly capacity of 500 tons per hour.

(2) The maximum annual throughput of material for emissions units F011, F012, and F013 combined, shall not exceed 4,350,000 TPY based upon a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform inspections on at least an hourly basis when the emissions unit is in operation, to determine if visible particulate emissions are being emitted from the barge unloading and material handling operations.

The permittee may, upon receipt of approval from the Ohio EPA field office, modify the above-mentioned frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the visible emissions requirements.

(2) The above-mentioned inspections shall be performed during representative, normal operating conditions.

(3) The permittee shall maintain the following records for this emissions unit while unloading and conveying material:

a. Hourly records that verify that each unloading and conveying operation occurring at that time was checked for visible emissions (This record shall include the date and time of the observation and indicate the presence or absence of any visible emissions).

b. Daily records that document the times that dust suppressant was applied at the required locations during barge unloading and material handling.

(4) The permittee shall maintain the following records for emissions units F011, F012, and F013 combined:

a. daily records of the type and amount, in tons, of each material loaded and unloaded for emissions units F011, F012, and F013 combined;

b. monthly records of the total amount, in tons, of all materials loaded and unloaded for emissions units F011, F012, and F013 combined (the summation of the daily records);

c. the rolling, 12-month summation of the total amount, in tons, of all materials loaded and unloaded for emissions units F011, F012, and F013 combined (this information shall include the current month and the preceding eleven calendar months); and

d. the rolling, 12-month summation of the total PE and PM10 emissions, in tons, for emissions units F011, F012, and F013 combined (this information shall include the current month and the preceding eleven calendar months).

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) 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:

i. the maximum annual throughput of material for emissions units F011, F012, and F013 combined, shall not exceed 4,350,000 TPY based upon a rolling, 12-month summation;

ii. the annual combined PE limitation for F011, F012, and F013 shall not exceed 28.6 tons per year, based on a rolling, 12-month summation; and

iii. theannual combined PM10 limitation for F011, F012, and F013 shall not exceed 13.5 tons per year, based on a rolling, 12-month summation.

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).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.

(4) The permittee shall identify in the annual Permit Evaluation Report if the control measure requirements for barge unloading and material handling materials, as outlined in b)(2)a. are not met. The report shall include an explanation of the cause of and the extent of the violation.

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:

Particulate emissions (PE) shall not exceed 6.6 pounds per hour.

Applicable Compliance Method:

The hourly PE limitation represents the emissions unit's potential to emit and was calculated by considering the maximum amount of material to be unloaded in one hour (500 tons/hour) multiplied by an emission factor of 0.1314 lb of PE/ton of material (emission factor from AP-42, section 13.2.4) and multiplied by [1 - the fractional control efficiency (0.90)].

b. Emission Limitation:

Particulate emissions 10 microns in diameter and less (PM10) shall not exceed 3.1 pounds per hour.

Applicable Compliance Method:

The hourly PM10 limitation represents the emissions unit's potential to emit and was calculated by considering the maximum amount of material to be unloaded in one hour (500 tons/hour) multiplied by an emission factor of 0.062 lb of PM10/ton of material (emission factor from AP-42, section 13.2.4) and multiplied by [1 - the fractional control efficiency (0.90)].

c. Emission Limitation:

Annual combined PE from F011, F012, and F013 shall not exceed 28.6 tons per year, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month throughput limitations outlined in c)(2) predicates compliance with the annual combined rolling, 12-month emission limitation. The worst case yearly PE result from the combination of the maximum allowable unloading and handling rates of material shall be calculated by the following method:

E = (max. amount of materials permitted to be loaded and unloaded at F011, F012, and F013 in TPY) x (F1) x (1 – CE) / 2000 lbs/ton.

Where:

E = PE rate (TPY)

Max. amount of material = 4,350,000 tons of material/year

F1 = emission factor for limestone, 0.1314 lb of PE/ton (emission factor from AP-42, section 13.2.4).

CE = assumed control efficiency provided by the control measures outlined in b)(2)a. (i.e. wetting and chemical suppressants) = 0.90

d. Emission Limitation:

Annual combined PM10 emissions from F011, F012, and F013 shall not exceed 13.5 tons per year.

Applicable Compliance Method:

Compliance with the rolling, 12-month throughput limitations outlined in c)(2) predicates compliance with the annual combined rolling, 12-month emission limitation. The worst case yearly PM10 result from the combination of the maximum allowable unloading and handling rates of material shall be calculated by the following method:

E = (max. amount of materials permitted to be loaded and unloaded at F011, F012, and F013 in TPY) x (F1) x (1 – CE) / 2000 lbs/ton.

Where:

E = PM10 rate (TPY)

Max. amount of material = 4,350,000 tons of material/year

F1 = emission factor for limestone, 0.062 lb of PE/ton (emission factor from AP-42, section 13.2.4).

CE = assumed control efficiency provided by the control measures outlined in b)(2)a. (i.e. wetting and chemical suppressants) = 0.90

e. Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with US EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.

2. F012, Barge Unloading (Mid)

Operations, Property and/or Equipment Description:

Barge Unloading (Middle Dock)

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. b)(1)b., c)(2), d)(4), e)(2), f)(1)c. and f)(1)d.

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)	Particulate emissions (PE) shall not exceed 15.8 pounds per hour. Particulate emissions 10 microns in diameter and less (PM10) shall not exceed 7.5 pounds per hour. See c)(1). The requirements of this rule also include compliance with OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Annual combined PE from F011, F012, and F013 shall not exceed 28.6 tons per year, based on a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Annual combined PM10 emissions from F011, F012, and F013 shall not exceed 13.5 tons per year, based on a rolling, 12-month summation. See c)(2).
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	See b)(2)a.
e.	40 CFR Part 60, Subpart Y (40 CFR 60.250-60.258) *Standards of Performance for Coal Preparation and Processing Plants (NSPS)* [In accordance with 40 CFR 60.250(b), the coal transfer and loading systems that are associated with this emissions unit commenced construction, reconstruction, or modification after October 27, 1974 and on or before April 28, 2008, and are subject to the requirements specified in this section.]	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-17-07(B)(1).

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures for the above-identified material handling operations 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 measures to ensure compliance:

i. The permittee shall minimize all drop heights (from the clam shell, conveyors, etc.). The releasing of material into the receiving hopper from the clam shell barge unloader shall take place only when the opening of the clam shell unloader is below the edge of the receiving hopper in order to minimize or eliminate visible emissions of fugitive dust.

ii. The permittee shall enclose all conveyors in order to minimize or eliminate visible emissions of fugitive dust.

iii. The permittee shall apply a suitable dust suppressant, as outlined in the application for this Permit to Install and Operate (PTIO). The dust suppressant shall be applied as needed to minimize or eliminate fugitive dust emissions.

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 rules 3745-17-08 and 3745-31-05(A)(3). Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The hourly PE and PM10 emission limitations outlined in b)(1) are based upon a worst case uncontrolled emission factor for limestone handling pursuant to US EPA AP-42, Table 13.2.4-1 (0.1314 lb PE/ton of limestone transferred and 0.062 lb PM10/ton of limestone transferred), the maximum rated capacity of the equipment, and the control requirements outlined in this permit, and represents the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.

In accordance with the application for this PTIO, this emissions unit may receive and/or transfer other materials so long as the applicable emission factor and calculated emission limitations do not exceed the emission limitations specified in b)(1). The permittee shall comply with the record keeping requirements in d)(4) regarding the type of material(s) received.

c. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR, Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR, Part 60 are also federally enforceable.

c) Operational Restrictions

(1) This emissions unit shall not operate in excess of its maximum rated hourly capacity of 1200 tons per hour.

(2) The maximum annual throughput of material for emissions units F011, F012, and F013 combined, shall not exceed 4,350,000 TPY based upon a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform inspections on at least an hourly basis when the emissions unit is in operation, to determine if visible particulate emissions are being emitted from the barge unloading and material handling of coal and all other materials.

The permittee may, upon receipt of approval from the Ohio EPA field office, modify the above-mentioned frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the visible emissions requirements.

(2) The above-mentioned inspections shall be performed during representative, normal operating conditions.

(3) The permittee shall maintain the following records for this emissions unit while unloading and conveying coal and all other materials:

a. Hourly records that verify that each unloading and conveying operation occurring at that time was checked for visible emissions (This record shall include the date and time of the observation and indicate the presence or absence of any visible emissions).

b. Daily records that document the times that dust suppressant was applied at the required locations during barge unloading and material handling.

(4) The permittee shall maintain the following records for emissions units F011, F012, and F013 combined:

a. daily records of the type and amount, in tons, of each material loaded and unloaded for emissions units F011, F012, and F013 combined;

b. monthly records of the total amount, in tons, of all materials loaded and unloaded for emissions units F011, F012, and F013 combined (the summation of the daily records);

c. the rolling, 12-month summation of the total amount, in tons, of all materials loaded and unloaded for emissions units F011, F012, and F013 combined (this information shall include the current month and the preceding eleven calendar months): and

d. the rolling, 12-month summation of the total PE and PM10 emissions, in tons, for emissions units F011, F012, and F013 combined (this information shall include the current month and the preceding eleven calendar months).

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) 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:

i. the maximum annual throughput of material for emissions units F011, F012, and F013 combined, shall not exceed 4,350,000 TPY based upon a rolling, 12-month summation;

ii. the annual combined PE limitation for F011, F012, and F013 shall not exceed 28.6 tons per year, based on a rolling, 12-month summation; and

iii. theannual combined PM10 limitation for F011, F012, and F013 shall not exceed 13.5 tons per year, based on a rolling, 12-month summation.

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).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.

(4) The permittee shall identify in the annual Permit Evaluation Report if the control measure requirements for barge unloading and material handling of materials, as outlined in b)(2)a. are not met. The report shall include an explanation of the cause of and the extent of the violation.

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:

Particulate emissions (PE) shall not exceed 15.8 pounds per hour.

Applicable Compliance Method:

The hourly PE limitation represents the emissions unit's potential to emit and was calculated by considering the maximum amount of material to be unloaded in one hour (1200 tons/hour) multiplied by an emission factor of 0.1314 lb of PE/ton of material (emission factor from AP-42, sections 13.2.4) and multiplied by [1 - the fractional control efficiency (0.90)].

b. Emission Limitation:

Particulate emissions 10 microns in diameter and less (PM10) shall not exceed 7.5 pounds per hour.

Applicable Compliance Method:

The hourly PM10 limitation represents the emissions unit's potential to emit and was calculated by considering the maximum amount of material to be unloaded in one hour (1200 tons/hour) multiplied by an emission factor of 0.062 lb of PM10/ton of material (emission factor from AP-42, section 13.2.4) and multiplied by [1 - the fractional control efficiency (0.90)].

c. Emission Limitation:

Annual combined PE from F011, F012, and F013 shall not exceed 28.6 tons per year.

Applicable Compliance Method:

Compliance with the rolling, 12-month throughput limitations outlined in c)(2) predicates compliance with the annual combined rolling, 12-month emission limitation. The worst case yearly PE result from the combination of the maximum allowable unloading and handling rates of material shall be calculated by the following method:

E = (max. amount of materials permitted to be loaded or unloaded at F011, F012, and F013 in TPY) x (F 1) x (1 – CE).

Where:

E = PE rate (TPY)

Max. amount of material = 4,350,000 tons of material/year

F1 = emission factor for unloading limestone, 0.1314 lb of PE/ton of material (emission factor from AP-42, section 13.2.4).

CE = assumed control efficiency provided by the control measures outlined in b)(2)a. (i.e. wetting and chemical suppressants) = 0.90

d. Emission Limitation:

Annual combined PM10 emissions from F011, F012, and F013 shall not exceed 13.5 tons per year.

Applicable Compliance Method:

Compliance with the rolling, 12-month throughput limitations outlined in c)(2) predicates compliance with the annual combined rolling, 12-month emission limitation. The worst case yearly PM10 result from the combination of the maximum allowable unloading and handling rates of material shall be calculated by the following method:

E = (max. amount of materials permitted to be loaded or unloaded at F011, F012, and F013 in TPY) x (F 1) x (1 – CE).

Where:

E = PM10 rate (TPY)

Max. amount of material = 4,350,000 tons of material/year

F1 = emission factor for unloading limestone, 0.062 lb of PM10/ton of material (emission factor from AP-42, section 13.2.4).

CE = assumed control efficiency provided by the control measures outlined in b)(2)a. (i.e. wetting and chemical suppressants) = 0.90

e. Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with US EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.

3. F013, Barge Loading, Unloading and Material Handling (West)

Operations, Property and/or Equipment Description:

Barge Loading, Unloading and Material Handling (West Dock)

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. b)(1)b., c)(2), d)(4), e)(2), f)(1)c. and f)(1)d.

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)	Particulate emissions (PE) shall not exceed 15.8 pounds per hour. Particulate emissions 10 microns in diameter and less (PM10) shall not exceed 7.5 pounds per hour. See c)(1). The requirements of this rule also include compliance with OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	Annual combined PE from F011, F012, and F013 shall not exceed 28.6 tons per year, based on a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Annual combined PM10 emissions from F011, F012, and F013 shall not exceed 13.5 tons per year, based on a rolling, 12-month summation. See c)(2).
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	See b)(2)a.
e.	40 CFR Part 60, Subpart Y (40 CFR 60.250-60.258) *Standards of Performance for Coal Preparation and Processing Plants (NSPS)* [In accordance with 40 CFR 60.250(b), the coal transfer and loading systems that are associated with this emissions unit commenced construction, reconstruction, or modification after October 27, 1974 and on or before April 28, 2008, and are subject to the requirements specified in this section.]	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-17-07(B)(1).

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures for the above-identified material handling operations 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 measures to ensure compliance:

i. The permittee shall minimize all drop heights (from the clam shell, conveyors, etc.). The releasing of material into the receiving hopper from the clam shell barge unloader shall take place only when the opening of the clam shell unloader is below the edge of the receiving hopper in order to minimize or eliminate visible emissions of fugitive dust.

ii. The permittee shall enclose all conveyors in order to minimize or eliminate visible emissions of fugitive dust.

iii. The permittee shall apply a suitable dust suppressant as outlined in the application for this Permit to Install and Operate (PTIO). The dust suppressant shall be applied as needed to minimize or eliminate fugitive dust emissions.

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 rules 3745-17-08 and 3745-31-05(A)(3). Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The hourly PE and PM10 emission limitations outlined in b)(1) are based upon a worst case uncontrolled emission factor for limestone handling pursuant to US EPA AP-42, Table 13.2.4-1 (0.1314 lb PE/ton of limestone transferred and 0.062 lb PM10/ton of limestone transferred), the maximum rated capacity of the equipment, and the control requirements outlined in this permit, and represents the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.

In accordance with the application for this PTIO, this emissions unit may receive and/or transfer other materials so long as the applicable emission factor and calculated emission limitations do not exceed the emission limitations specified in b)(1). The permittee shall comply with the record keeping requirements in d)(4) regarding the type of material(s) received.

c. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR, Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR, Part 60 are also federally enforceable.

c) Operational Restrictions

(1) The maximum hourly capacity of this emissions unit is 1200 tons per hour.

(2) The maximum annual throughput of material for emissions units F011, F012, and F013 combined, shall not exceed 4,350,000 TPY based upon a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform inspections on at least an hourly basis when the emissions unit is in operation, to determine if visible particulate emissions are being emitted from the barge loading, unloading, and material handling of coal and all other materials.

The permittee may, upon receipt of approval from the Ohio EPA field office, modify the above-mentioned frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the visible emissions requirements.

(2) The above-mentioned inspections shall be performed during representative, normal operating conditions.

(3) The permittee shall maintain the following records for this emissions unit while loading, unloading, and conveying coal and all other materials:

a. Hourly records that verify that each loading, unloading, and conveying operation occurring at that time was checked for visible emissions (This record shall include the date and time of the observation and indicate the presence or absence of any visible emissions).

b. Daily records that document the times that dust suppressant was applied at the required locations during barge loading, unloading, and material handling.

(4) The permittee shall maintain the following records for emissions units F011, F012, and F013 combined:

a. daily records of the type and amount, in tons, of each material loaded and unloaded for emissions units F011, F012, and F013 combined;

b. monthly records of the total amount, in tons, of all materials loaded and unloaded for emissions units F011, F012, and F013 combined (the summation of the daily records);

c. the rolling, 12-month summation of the total amount, in tons, of all materials loaded and unloaded for emissions units F011, F012, and F013 combined (this information shall include the current month and the preceding eleven calendar months); and

d. the rolling, 12-month summation of the total PE and PM10 emissions, in tons, for emissions units F011, F012, and F013 combined (this information shall include the current month and the preceding eleven calendar months).

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) 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:

i. the maximum annual throughput of material for emissions units F011, F012, and F013 combined, shall not exceed 4,350,000 TPY based upon a rolling, 12-month summation;

ii. the annual combined PE limitation for F011, F012, and F013 shall not exceed 28.6 tons per year, based on a rolling, 12-month summation; and

iii. theannual combined PM10 limitation for F011, F012, and F013 shall not exceed 13.5 tons per year, based on a rolling, 12-month summation.

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).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.

(4) The permittee shall identify in the annual Permit Evaluation Report if the control measure requirements for barge loading, unloading and material handling of materials, as outlined in b)(2)a. are not met. The report shall include an explanation of the cause of and the extent of the violation.

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:

Particulate emissions (PE) shall not exceed 15.8 pounds per hour.

Applicable Compliance Method:

The hourly PE limitation represents the emissions unit's potential to emit and was calculated by considering the maximum amount of material to be loaded or unloaded in one hour (1200 tons/hour) multiplied by an emission factor of 0.1314 lb of PE/ton of material (emission factor from AP-42, section 13.2.4) and multiplied by [1 - the fractional control efficiency (0.90)].

b. Emission Limitation:

Particulate emissions 10 microns in diameter and less (PM10) shall not exceed 7.5 pounds per hour.

Applicable Compliance Method:

The hourly PM10 limitation represents the emissions unit's potential to emit and was calculated by considering the maximum amount of material to be loaded or unloaded in one hour (1200 tons/hour) multiplied by an emission factor of 0.062 lb of PM10/ton of material (emission factor from AP-42, section 13.2.4) and multiplied by [1 - the fractional control efficiency (0.90)].

c. Emission Limitation:

Annual combined PE from F011, F012, and F013 shall not exceed 28.6 tons per year, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month throughput limitations outlined in c)(2) predicates compliance with the annual combined rolling, 12-month emission limitation. The worst case yearly PE result from the combination of the maximum allowable loading, unloading and handling rates of material shall be calculated by the following method:

For barge loading and unloading:

E = (max. amount of materials permitted to be loaded and unloaded at F011, F012 and F013 in TPY) x (F1) x (1 – CE) / 2000 lbs/ton.

Where:

E = PE rate (TPY)

Max. amount of material = 4,350,000 tons of material/year

F1 = emission factor for loading and unloading limestone, 0.1314 lb of PE/ton (emission factor from AP-42, section 13.2.4).

CE = assumed control efficiency provided by the control measures outlined in b)(2)a. (i.e. wetting and chemical suppressants) = 0.90

d. Emission Limitation:

Annual combined PM10 emissions from F011, F012, and F013 shall not exceed 13.5 tons per year, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month throughput limitations outlined in c)(2) predicates compliance with the annual combined rolling, 12-month emission limitation. The worst case yearly PM10 result from the combination of the maximum allowable loading, unloading and handling rates of material shall be calculated by the following method:

For barge loading and unloading:

E = (max. amount of materials permitted to be loaded and unloaded at F011, F012 and F013 in TPY) x (F1) x (1 – CE) / 2000 lbs/ton.

Where:

E = PM10 rate (TPY)

Max. amount of material = 4,350,000 tons of material/year

F1 = emission factor for loading and unloading limestone, 0.062 lb of PM10/ton (emission factor from AP-42, section 13.2.4).

CE = assumed control efficiency provided by the control measures outlined in b)(2)a. (i.e. wetting and chemical suppressants) = 0.90.

e. Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with US EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.

4. F017, Material Handling, Railcar

Operations, Property and/or Equipment Description:

Railcar loading and unloading

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. b)(1)b., c)(2), d)(3), e)(2), f)(1)c., and f)(1)d.

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)	Particulate emissions (PE) shall not exceed 6.6 pounds per hour. Particulate emissions 10 microns and less (PM10) shall not exceed 3.1 pounds per hour. The requirements of this rule also include compliance with OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	PE shall not exceed 26.3 tons per year, based on a rolling, 12-month summation. PM10 shall not exceed 12.4 tons per year, based on a rolling, 12-month summation. See c)(2).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 60, Subpart Y (40 CFR 60.250-60.258) *Standards of Performance for Coal Preparation and Processing Plants (NSPS)* [In accordance with 40 CFR 60.250(b), the coal transfer and loading systems that are associated with this emissions unit commenced construction, reconstruction, or modification after October 27, 1974 and on or before April 28, 2008, and are subject to the requirements specified in this section.]	The visible particulate emission limitation established by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and OAC rule 3745-17-07(B)(1).
d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity as a three minute average.
e.	OAC rule 3745-17-08(B)	See b)(2)a.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures for the above-identified material handling operations 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 utilize wet suppression to ensure compliance.

For each material handling operation that is not adequately enclosed, the above-identified control measure 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 is necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure shall continue during the operation of the material handling operations until further observation confirms that use of the control measure is unnecessary.

Implementation of the above-mentioned control measure in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05(A)(3). Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR, Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR, Part 60 are also federally enforceable.

c. The hourly PE and PM10 emission limitations outlined in b)(1) are based upon a worst case uncontrolled emission factor for limestone handling pursuant to US EPA AP-42, Table 13.2.4-1 (0.1314 lb PE/ton of limestone transferred and 0.062 lb PM10/ton of limestone transferred), the maximum rated capacity of the equipment, and the control requirements outlined in this permit, and represents the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.

In accordance with the application for this PTIO, this emissions unit may receive and/or transfer other materials so long as the applicable emission factor and calculated emission limitations do not exceed the emission limitations specified in b)(1). The permittee shall comply with the record keeping requirements in d)(3) regarding the type of material(s) received.

c) Operational Restrictions

(1) This emissions unit shall not operate in excess of its maximum rated hourly capacity of 500 tons per hour.

(2) The maximum annual throughput of material for emissions unit F017 shall not exceed 4,000,000 TPY based upon a rolling, 12-month summation.

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 the loading and unloading operations associated with this emissions unit in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

Material Handling Operation(s)	Minimum Inspection Frequency
All Loading and Unloading Operations	Once During Each Day of Operation

The inspections shall be performed during representative, normal operating conditions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

(2) The permittee shall maintain records of the following information for the material handling operations:

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 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.

The information in “d” shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

a. monthly records of the type and amount, in tons, of each material loaded and unloaded in this emissions unit;

b. monthly records of the total amount, in tons, of all materials loaded and unloaded in this emissions unit;

c. the rolling, 12-month summation of the total amount, in tons, of all materials loaded and unloaded in this emissions unit (this information shall include the current month and the preceding eleven calendar months); and

d. the rolling, 12-month summation of the total PE and PM10 emissions, in tons, for this emissions unit (this information shall include the current month and the preceding eleven calendar months).

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) 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:

i. the maximum annual throughput of material for emissions unit F017 shall not exceed 4,000,000 TPY based upon a rolling, 12-month summation;

ii. the annual PE limitation for emissions unit F017 shall not exceed 26.3 tons per year, based on a rolling, 12-month summation; and

iii. theannual PM10 limitation for emissions unit F017 shall not exceed 12.4 tons per year, based on a rolling, 12-month summation.

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).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.

(4) The permittee shall identify the following information in the annual Permit Evaluation Report in accordance with the monitoring requirements for visible emissions in terms d)(1) and d)(2) above:

a. each day during which an inspection of the material loading and unloading operations was not performed by the required frequency; and

b. 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. Emission Limitation:

Particulate emissions (PE) shall not exceed 6.6 pounds per hour.

Applicable Compliance Method:

The hourly PE limitation represents the emissions unit's potential to emit and was calculated by considering the maximum amount of material to be loaded or unloaded in one hour (500 tons/hour) multiplied by an emission factor of 0.1314 lb of PE/ton of material loaded (emission factor from AP-42, section 13.2.4) and multiplied by [1 - the fractional control efficiency (0.90)].

b. Emission Limitation:

Particulate emissions 10 microns and less (PM10) shall not exceed 3.1 pounds per hour.

Applicable Compliance Method:

The hourly PM10 limitation represents the emissions unit's potential to emit and was calculated by considering the maximum amount of material to be loaded or unloaded in one hour (500 tons/hour) multiplied by an emission factor of 0.062 lb of PM10/ton of material loaded (emission factor from AP-42, section 13.2.4) and multiplied by [1 - the fractional control efficiency (0.90)].

c. Emission Limitation:

PE shall not exceed 26.3 tons per year as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month throughput limitations outlined in c)(2) predicates compliance with the annual rolling, 12-month emission limitation. The worst case yearly PE result from the combination of the maximum allowable loading, unloading and handling rates of material shall be calculated by the following method:

For railcar loading and unloading:

E = (max. amount of materials permitted to be loaded and unloaded in TPY) x (F1) x (1 – CE) / 2000 lbs/ton.

Where:

E = PE rate (TPY)

Max. amount of material loaded and unloaded = 4,000,000 tons of material/year

F1 = emission factor for loading and unloading limestone, 0.1314 lb of PE/ton (emission factor from AP-42, section 13.2.4).

CE = assumed control efficiency provided by the control measures outlined in b)(2)a. (i.e. wet suppression) = 0.90

d. Emission Limitation:

PM10 shall not exceed 12.4 tons per year as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month throughput limitations outlined in c)(2) predicates compliance with the annual rolling, 12-month emission limitation. The worst case yearly PM10 result from the combination of the maximum allowable loading, unloading and handling rates of material shall be calculated by the following method:

For railcar loading and unloading:

E = (max. amount of materials permitted to be loaded and unloaded in TPY) x (F1) x (1 – CE) / 2000 lbs/ton.

Where:

E = PM10 rate (TPY)

Max. amount of material loaded and unloaded = 4,000,000 tons of material/year

F1 = emission factor for loading and unloading limestone, 0.062 lb of PM10/ton (emission factor from AP-42, section 13.2.4).

CE = assumed control efficiency provided by the control measures outlined in b)(2)a. (i.e. wet suppression) = 0.90

e. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity as a three minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with US EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.