

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **13-04611**

A. Source Description

The Oglebay Norton Company has submitted a permit to install modification for a Taconite material handling operation for the purpose of loading river boats. The Oglebay Norton Company has submitted a permit to install modification application for sources F003 and F004 to account for the increase in throughput material at the facility and increased emissions.

B. Facility Emissions and Attainment Status

This facility has the potential to emit uncontrolled particulate emissions in excess of 100 TPY which would result in Title V applicability. Cuyahoga County has attainment status for particulate emissions.

C. Source Emissions

This modified source has the potential to emit more than 100 tons of particulate emissions per year resulting in TV applicability. However, the company has requested a Federal Enforceable Permit to Install (Syn Minor) in order to avoid Title V. The allowable will be 6.21 TPY (fugitive) and 0.13 tpy (stack) of particulate emissions, combined for sources F003 and F004. The contribution from the other source at the facility, F001 (roadways), will be permitted under the MGP requirements and will have an allowable of 18.6 TPY of particulate emissions.

D. Conclusion

Limiting the throughput rate of this facility to the following:

F003 Unload from Vessels - 4.9 million tons of Taconite material, 640,000 tons of iron ore concentrate and 2.0 million tons of Crushed Limestone

Load of railcars - 1.2 million tons of Taconite material, 640,000 tons of iron ore concentrate and 2.0 million tons of Crushed Limestone

F004 source transfer rate - 3.7 million tons of Taconite material.

will restrict the particulate emissions to 6.21 TPY(fugitive) and 0.13 TPY(stack) based on a rolling 12-month summation. Therefore, the Oglebay Norton Company will not be subject to Title V permitting.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 13-04611

Fac ID: 1318006458

DATE: 3/28/2006

Oglebay Norton Cleveland Bulk Terminal
Daniel Rose
1001 Lakeside Avenue North Point Tower, 15th Floor
Cleveland, OH 44114-1151

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2500** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CLAA

PA

CUYAHOGA COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 13-04611 FOR AN AIR CONTAMINANT SOURCE FOR
Oglebay Norton Cleveland Bulk Terminal**

On 3/28/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Oglebay Norton Cleveland Bulk Terminal**, located at **5400 Whiskey Island, Cleveland, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04611:

Non-General Permit for emissions units F003 an dF004.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue,
Cleveland, OH 44114 [(216)664-2324]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04611

Application Number: 13-04611
Facility ID: 1318006458
Permit Fee: **To be entered upon final issuance**
Name of Facility: Oglebay Norton Cleveland Bulk Terminal
Person to Contact: Daniel Rose
Address: 1001 Lakeside Avenue North Point Tower, 15th Floor
Cleveland, OH 44114-1151

Location of proposed air contaminant source(s) [emissions unit(s)]:

**5400 Whiskey Island
Cleveland, Ohio**

Description of proposed emissions unit(s):

Non-General Permit for emissions units F003 an dF004.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Oglebay Norton Cleveland Bulk Terminal
PTI Application: 13-04611
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1318006458

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only) TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE (stack)	0.13
PM (fugitive)	6.21

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>wind erosion from storage piles (see section A.2.a for identification of storage piles)</u>	<u>Applicable Rules/Requirements</u>
F003 - vessel unloading of Taconite, iron ore concentrate and crushed limestone material into storage piles, modification to increase throughput		OAC rule 3745-31-05(A)(3)

MODIFIED

This PTI supercedes PTI 13-04039 issued on January 23, 2003.

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B)

Taconite and iron ore concentrate material railcar loading

OAC rule 3745-31-05(C)
Synthetic Minor to avoid Title V

Emissions Unit ID: F003

OAC rule 3745-31-05(A)(3)

Applicable Emissions
Limitations/Control Measures

OAC rule 3745-17-07(B)(1)

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b through A.2.d).

OAC rule 3745-17-08(B)

Visible emissions of fugitive dust shall not exceed 10 percent opacity as a three-minute average.

OAC rule 3745-17-07(B)(6)

OAC rule 3745-31-05(C)
Synthetic Minor to avoid Title V

The requirements of this rule also include compliance with OAC rule 3745-31-05(C).

OAC rule 3745-17-08(B), (B)(6)

The visible fugitive dust emission limitation specified by this rule is less stringent than the visible fugitive dust emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-31-05(C)
Synthetic Minor to avoid Title V

The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-31-05(A)(3)

1.44 TPY of fugitive dust (PM) emissions as a rolling, 12-month summation.

No visible emissions of fugitive dust except for 1 minute during any 60 minute period.

best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b

**Oglet
PTI A**

Emissions Unit ID: **F003**

Issued: To be entered upon final issuance

through A.2.d) .

The requirements of this rule also include compliance with OAC rule 3745-31-05(C).

The visible fugitive dust emission limitation specified by this rule is less stringent than the visible fugitive dust emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).

2.65 TPY of fugitive dust (PM) emissions as a rolling, 12-month summation.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b through A.2.d).

Visible emissions of fugitive dust shall not exceed 10 percent opacity as a three-minute average.

The requirements of this rule also include compliance with OAC rule 3745-31-05(C).

The visible fugitive dust emission limitation specified by

this rule is less stringent than the visible fugitive dust emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).

0.52 TPY of fugitive dust (PM) emissions as a rolling, 12-month summation.

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2. Additional Terms and Conditions

2.a The storage piles that are covered by this permit and subject to the above-mentioned requirements are:

- three to five Taconite ore pellet piles
- two iron ore concentrate pellet piles
- three to five crushed limestone piles

The material handling operation(s) that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

- unloading from Great Lakes vessel of Taconite, iron ore concentrate pellets and crushed limestone
- front end loading of Taconite, iron ore concentrate pellets and crushed limestone into rail cars

2.b The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to the use of water for both the Taconite ore piles, crushed limestone piles and a surface crusting agent for the iron ore concentrate piles as the type of dust suppressants to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

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:

material handling operation(s):	control measure(s):
vessel unloading and rail car	- water or other suitable dust suppressant
loading of iron ore pellets and crushed limestone material	- minimize drop height from front-end loader

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

Emissions Unit ID: **F003**

- 2.c** 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 ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

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.

- 2.d** 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.

B. Operational Restrictions

- 1. The maximum annual material processing rate for material handling operations shall not exceed the limitations identified below, based upon a rolling, 12-month summation of the monthly processing rates:

Unloading from vessels	Loading of railcars
4.9 million tons of Taconite pellets	1.2 million tons of Taconite pellets
640,000 tons of iron ore concentrated pellets	640,000 tons of iron ore concentrated pellets
2.0 million tons of crushed limestone	2.0 million tons of crushed limestone

The permittee has historical data to demonstrate compliance with the above limitations; therefore, the initial 12-month operating limitations are not needed.

- 2. The permittee shall handle only taconite ore pellets which have been screened and washed prior to receipt, and have a maximum silt content of 4.0 %, using the ASTM C-136 test method.
- 3. The permittee shall handle only crushed limestone having a maximum silt content of 2.0 %, using the ASTM C-136 test method.

C. Monitoring and/or Recordkeeping Requirements

Issued: To be entered upon final issuance

1. Except as otherwise provided in this section, the permittee shall perform daily inspections of the wind erosion from pile surfaces associated with each storage pile.

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:

material handling operation(s)	minimum inspection frequency
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-vessel unloading	daily
-front end rail car loading	daily

2. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The above-mentioned inspections shall be performed during representative, normal operating conditions and does not include weekends and holidays or other non-operational times.
4. The purpose of these inspections is to determine the need for implementing the control measure specified in this permit for wind erosion from the surface of a storage pile and the material handling operations. The inspections shall be performed during representative, normal storage pile operating conditions.
5. The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality, 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.
6. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

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

The information required in 6.d. shall be kept separately for each material handling operation and the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

7. The permittee shall maintain records of the surface areas of the taconite, iron ore concentrate and crushed limestone piles, in acres, for the purposes of the wind erosion calculations in section E.1.d below.
8. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the separate amounts of Taconite, iron ore concentrate and crushed limestone material processed for the vessel unloading and railcar loading operations, in tons, for each month;
 - b. the rolling 12-month summation of the monthly Taconite, iron ore concentrate and crushed limestone material processing rates, in tons; and
 - c. the silt content of the Taconite, iron ore concentrate and crushed limestone material based upon results of the ASTM C-136 test method.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports to the Cleveland Division of Air Quality that identify any of the following occurrences:
 - 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; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

Issued: To be entered upon final issuance

2. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality that identify all exceedances of the rolling, 12-month Taconite, iron ore concentrate and crushed limestone material processing rate limitations.
3. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality that identify all exceedances of the silt content restriction for the Taconite, iron ore concentrate and crushed limestone material.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation -

Visible emissions of fugitive dust shall not exceed 10 percent opacity as a three-minute average. (vessel unloading)

Applicable Compliance Method

Compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- b. Emission Limitation -

1.44 TPY of fugitive dust (PM) emissions from vessel unloading of Taconite, iron ore concentrate and crushed limestone material

Applicable Compliance Method

Compliance shall be determined using equation 1 taken from the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 13.2.4 (1/95), in which particulate emission factors for Taconite (0.002 lb per ton of material transferred), iron ore concentrate (0.0008 lb per ton of material transferred) and crushed limestone (0.0006 lb per ton of material transferred) were established. Each emission factor is multiplied by the actual annual material throughput, in tons, and the control efficiency of the water

Emissions Unit ID: F003

sprayers (1-0.75). The summation of the calculated emission rates represent the total emission rate of this activity within this emissions unit. Divide the total by 2000 lbs/ton to convert to tons per year.

- c. Emission Limitation -
no visible emissions of fugitive dust except for 1 minute during any 60-minute period
(wind erosion of storage piles)

Applicable Compliance Method -

Compliance with the emission limitation for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

- d. Emission Limitation -
2.65 TPY of fugitive dust (PM) emissions from wind erosion

Applicable Compliance Method

The TPY emission limitation shall be based on calculations using the equation taken from U.S. EPA's Control of Open Fugitive Dust Sources September 1988 to establish the emission factor in lb/day/acre. The calculated emission factor is 6.22 lbs of particulate emissions/day/acre of materials stored. This emission factor is multiplied by the surface area of the storage piles in acres (based on annual tonnage of taconite material and crushed limestone stored), (1-0.87) to account for the 87% watering emission control efficiency. The calculated value is then divided by 2000 lbs/ton to determine emissions in tons/year.

- e. Emission Limitation -
Visible emissions of fugitive dust shall not exceed 10 percent opacity as a three-minute average.(railcar loading)

Applicable Compliance Method

Compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- f. Emission Limitation -

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PTI A

Emissions Unit ID: **F003**

Issued: To be entered upon final issuance

0.52 TPY of fugitive dust (PM) emissions from Taconite, iron ore concentrate and crushed limestone material railcar loading

Applicable Compliance Method

Compliance shall be determined using equation 1 taken from the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 13.2.4 (1/95), in which particulate emission factors for Taconite (0.002 lb per ton of material transferred), iron ore concentrate (0.0008 lb per ton of material transferred) and crushed limestone (0.0006 lb per ton of material transferred) were established. Each emission factor is multiplied by the actual annual material load out, in tons, and the control efficiency through the use of water (1-0.75). The summation of the calculated emission rates represent the total emission rate of this activity within this emissions unit. Divide the total by 2000 lbs/ton to convert to tons per year.

F. Miscellaneous Requirements

1. The following special terms and conditions of this permit are federally enforceable: A - F.

Oglet
PTI A

Emissions Unit ID: **F004**

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, <u>and/or Equipment</u>	fugitive emission points associated with the covered conveyors and conveyor transfer points	fugitive emission points associated with the end drop point of Taconite material into the river shuttle boats
<p>F004 - Taconite material handling operation to load river boats, consisting of an enclosed conveyor system from the storage area with transfer points controlled by water spray bars and baghouses.</p>		
<p>MODIFIED</p>		
<p>This PTI supercedes PTI 13-04039 issued on January 23, 2003.</p>		

Applicable Rules/Requirements

OAC rule 3745-31-05(A)(3)

OAC rule 3745-31-05(C)
Synthetic Minor to avoid Title V

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B)

OAC rule 3745-17-07(A)

OAC rule 3745-31-05(C)
Synthetic Minor to avoid Title V

OAC rule 3745-17-11(B)

OAC rule 3745-31-05(A)(3)

OAC rule 3745-31-05(C)
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OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B)

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<p>Applicable Emissions <u>Limitations/Control Measures</u></p>	<p>Sections A.2.b through A.2.d).</p>	<p>shall not exceed 20 percent opacity as a three-minute average.</p>
<p>0.18 lb/hr of particulate emissions per transfer point (stack emissions)</p>	<p>Visible emissions of fugitive dust shall not exceed 10 percent opacity as a three-minute average.</p>	<p>The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).</p>
<p>Visible particulate emissions from each baghouse stack shall not exceed 10% opacity, as a six-minute average.</p>	<p>The requirements of this rule also include compliance with OAC rule 3745-31-05(C).</p>	<p>0.93 TPY of fugitive dust (PM) emissions as a rolling, 12-month summation.</p>
<p>The requirements of this rule also include compliance with OAC rule 3745-31-05(C).</p>	<p>The visible fugitive dust emission limitation specified by this rule is less stringent than the visible fugitive dust emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>	
<p>See section A.2.b</p>	<p>The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).</p>	
<p>The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>	<p>0.67 TPY of fugitive dust (PM) emissions as a rolling, 12-month summation.</p>	
<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>	<p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b through A.2.d).</p>	
<p>0.13 TPY of particulate emissions (stack - total for 2 baghouses) as a rolling, 12-month summation.</p>	<p>The requirements of this rule also include compliance with OAC rules 3745-17-07(B)(1) and 3745-31-05(C).</p>	
<p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see</p>	<p>Visible emissions of fugitive dust</p>	

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2. Additional Terms and Conditions

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

- 2 enclosed conveyor transfer belts for Taconite material; and
- 1 drop point of Taconite material into the river shuttle boats.

2.b The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

- enclosure of all the Taconite conveyor belts, excluding the drop point of the Taconite material into the river shuttle boats;
- installation of a water spray scrubber at each of the belt to belt transfer points;
- installation of a baghouse at each of the belt to belt transfer points; and
- installation of a water spray bar at the boom end drop point of Taconite material into the river shuttle boats.

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

2.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.

2.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 rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

1. The permittee shall operate a water spray scrubber box at each belt to belt transfer point of the material handling operation for control of particulate emissions while this emissions unit is in operation.
2. The permittee shall operate a water spray bar at the boom end drop point of Taconite material into the river shuttle boats for the control of particulate emissions while this emissions unit is in operation.
3. The permittee shall operate a baghouse at each belt to belt transfer point of the material handling operation for control of particulate emissions while this emissions unit is in operation.
4. The pressure drop across each of the baghouses shall be maintained within the range of 2 - 8 inches of water while the emissions unit is in operation.
5. The maximum annual throughput rate for this emissions unit for Taconite material shall not exceed 3.7 million tons, based upon a rolling, 12-month summation of the monthly throughput rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the throughput rates specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative throughput rate in tons</u>
1	1,480,000
1-2	1,960,000
1-3	2,260,000
1-4	2,560,000
1-5	2,860,000
1-6	3,160,000
1-7	3,360,000
1-8	3,560,000
1-9	3,700,000

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1-10	3,700,000
1-11	3,700,000
1-12	3,700,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual Taconite material handling limitation for this emissions unit shall be based upon a rolling, 12-month summation of the monthly material throughput rates.

6. The permittee shall handle only taconite ore pellets which have been screened and washed prior to receipt, and have a maximum silt content of 4.0 %, using the ASTM C-136 test method.

C. 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 daily inspections of such operations.
2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality, 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.

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.

5. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across each of the baghouses while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each of the baghouses on a daily basis whenever this emissions unit is in operation.
6. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the throughput amount of Taconite material, in tons, for each month;
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the throughput amount of Taconite material, in tons; and
 - c. the silt content of the Taconite and iron ore concentrate material based upon results of the ASTM C-136 test method.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative amount of Taconite material processed, in tons, for each calendar month.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports to the Cleveland Division of Air Quality that identify any of the following occurrences:
 - 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.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Cleveland Division of Air Quality that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
3. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland

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Division of Air Quality that identify all exceedances of the rolling, 12-month Taconite material processing rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

4. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality that identify all exceedances of the silt content restriction for the Taconite and iron ore concentrate material.
5. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
0.18 lb/hr of particulate emissions per each transfer point (stack emissions)

Applicable Compliance Method
If required, compliance shall be determined using Methods 1 - 5 of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation -
Visible particulate emissions from each baghouse stack shall not exceed 10 percent opacity as a six-minute average.

Applicable Compliance Method(s) -
Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - c. Emission Limitation -
0.13 TPY of particulate emissions (stack emissions, total for 2 baghouses)

Applicable Compliance Method
Compliance with the above limitation shall be based on the Taconite throughput record keeping requirement in Section C. of this permit. In addition, compliance shall be determined using the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 11.23 (1/95) which

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contains an emission factor of 0.0036 lb of particulate emissions per ton of material transferred using wet spray scrubber controls. This emission factor is multiplied by the actual annual material throughput, in tons, the capture efficiency (0.95), the control efficiency of the baghouses (1-0.99) and a factor of (2) to reference the number of belt transfer points in the operation. Divide the result by 2000 lbs/ton to convert to tons per year.

d. Emission Limitation -

Visible emissions of fugitive dust from the conveyor transfer points shall not exceed 10 percent opacity as a three-minute average.

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Applicable Compliance Method(s) -

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

e. Emission Limitation -

0.67 TPY of fugitive dust (PM) emissions, as a rolling, 12-month summation (fugitive emissions escaping the two baghouse enclosures)

Applicable Compliance Method -

Compliance with the above limitation shall be based on the Taconite throughput record keeping requirement in Section C. of this permit. In addition, compliance shall be determined using the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 11.23 (1/95) which contains an emission factor of 0.0036 lb of particulate emissions per ton of material transferred using wet spray scrubber controls. This emission factor is multiplied by the actual annual material throughput, in tons, the capture efficiency (1 - 0.95), and a factor of (2) to reference the number of belt transfer points in the operation. Divide the result by 2000 lbs/ton to convert to tons per year.

f. Emission Limitation -

Visible emissions of fugitive dust from the shuttle boat loading operation shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method(s) -

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

g. Emission Limitation -

0.93 TPY of fugitive dust (PM) emissions, as a rolling, 12-month summation (fugitive emissions from the drop points into the shuttle boats)

Compliance with the above limitation shall be based on the Taconite throughput record keeping requirement in Section C. of this permit. In addition, compliance shall also be based on the last phase of the load out operation consisting of the drop point of material into the shuttle boats using equation 1 taken from the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 13.2.4 (1/95), in which an emission factor of 0.002 lb

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of particulate emissions per ton of material transferred was established. This emission factor is multiplied by the actual annual material throughput, in tons, and the control efficiency of the water sprayers ($1 - 0.75$). Divide the result by 2000 lbs/ton to convert to tons per year.

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F. Miscellaneous Requirements

1. The following special terms and conditions of this permit are federally enforceable: A -
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