



6/18/2014

Certified Mail

John Hendricks
General James M. Gavin Power Plant
1 Riverside Plaza
Columbus, OH 43215-2373

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0627010056
Permit Number: P0116696
Permit Type: Administrative Modification
County: Gallia

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI 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 Ohio EPA DAPC, Southeast District Office at (740)3858501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-SEDO; Kentucky; West Virginia



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
General James M. Gavin Power Plant**

Facility ID:	0627010056
Permit Number:	P0116696
Permit Type:	Administrative Modification
Issued:	6/18/2014
Effective:	6/18/2014



Division of Air Pollution Control
Permit-to-Install
for
General James M. Gavin Power Plant

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Final Permit-to-Install
General James M. Gavin Power Plant
Permit Number: P0116696
Facility ID: 0627010056
Effective Date: 6/18/2014

Authorization

Facility ID: 0627010056
Facility Description: Power Generating Plant
Application Number(s): M0002742
Permit Number: P0116696
Permit Description: Agency-initiated administrative modification (P0111468 issued final 5/8/2013) to incorporate Best Available Technology (BAT) guidance dated 2/7/2014.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 6/18/2014
Effective Date: 6/18/2014

This document constitutes issuance to:

General James M. Gavin Power Plant
7397 N. St Rt #7
Attn: D. E. Workman
Cheshire, OH 45620-0271

of a Permit-to-Install 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:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted a Permit-to-Install for the 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 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


Craig W. Butler
Director



Final Permit-to-Install
General James M. Gavin Power Plant
Permit Number: P0116696
Facility ID: 0627010056
Effective Date: 6/18/2014

Authorization (continued)

Permit Number: P0116696
Permit Description: Agency-initiated administrative modification (P0111468 issued final 5/8/2013) to incorporate Best Available Technology (BAT) guidance dated 2/7/2014.

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

Emissions Unit ID:	F001
Company Equipment ID:	Coal Handling System
Superseded Permit Number:	P0111468
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	Roadways & Parking
Superseded Permit Number:	P0111468
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
General James M. Gavin Power Plant
Permit Number: P0116696
Facility ID: 0627010056
Effective Date:6/18/2014

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been



necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
 - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions,



and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted 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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.



9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- 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 state-only required 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 Ohio EPA DAPC, Southeast District Office. 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, 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.



- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.



- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Final Permit-to-Install
General James M. Gavin Power Plant
Permit Number: P0116696
Facility ID: 0627010056
Effective Date: 6/18/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
General James M. Gavin Power Plant
Permit Number: P0116696
Facility ID: 0627010056
Effective Date:6/18/2014

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



Final Permit-to-Install
General James M. Gavin Power Plant
Permit Number: P0116696
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C. Emissions Unit Terms and Conditions



1. F001, Coal Handling System

Operations, Property and/or Equipment Description:

REF Coal Material Handling System. The throughput of the coal processed in the REF Material Handling System is limited to 13,000,000 tons per year. In processing the coal, 130,000 ton per year dry REF material may be added.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>There shall be no visible particulate emissions (PE) of fugitive dust emitted from the material handling, conveying/transfer points and/or the area immediately above the capture systems serving this emissions unit.</p> <p>The PE from the baghouse and/or bin vent filters associated with this emissions unit shall not exceed 0.010 grain per dry standard cubic feet of the exhaust gases, or there shall be no visible PE from the baghouses and/or bin vent filters.</p> <p>See c)(1).</p>
b.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	Particulate matter 10 microns in diameter or less (PM-10) emissions shall not exceed 1.56 tons/month, averaged over a 12-month rolling period.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Particulate matter 2.5 microns in diameter or less (PM-2.5) emissions shall not exceed 0.24 ton/month, averaged over a 12-month rolling period.</p> <p>See b)(2)e. below.</p>
d.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)f. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(B)(5)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
f.	OAC rule 3745-17-08(B)	This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
g.	40 CFR Part 60, Subpart Y (40 CFR 60.254(b)(1))	The owner or operator must not cause to be discharged into the atmosphere from the affected facility any gases which exhibit 10 percent (%) opacity or greater.
h.	40 CFR 60.1-19 (40 CFR 60.1(a))	The provisions of Subpart A apply to the owner or operator of any stationary source which contains an affected facility that commenced construction or modification after the date of publication in 40 CFR Part 60 that is applicable to that facility.

(2) Additional Terms and Conditions

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

Material Handling, Conveying/Transfer Points

North Barge Unloader Bucket to RN
 Conveyor RN to R1N
 Conveyor R1N to 12N
 Conveyor 12N to 24
 South Barge Unloader Bucket to RS
 Conveyor RS to 1RS
 Conveyor 1RS to 2RS
 Conveyor 2RS to 24
 Conveyor 24 to 46
 Conveyor 46 to 67
 Conveyor 67 to Radial Stacker
 Rail Car Dump to T12
 Conveyor T12 to T23
 Conveyor T23 to 64
 Conveyor 64 to 46
 Under pile Feeders to 7N or 7S
 Conveyor 7N or 7S to 77N or 77S



Conveyor 77N or 77S to 77BN or 77BS
Conveyor 77BN or 77BS to Crushers
Crushers to 78N or 78S
Conveyor 78N or 78S to 8A
Conveyor 8A to AB
Conveyor AB to Tripper Conveyors
Conveyor 78N or 78S to 89
Conveyor 89 to 9F
Conveyor 9F to FD
Conveyor FD to DC
Conveyor DC to Tripper Conveyor

REF Material Handling System (Subject to Part 60 Subpart Y)

Transfer from Existing Conveyors 77BS or 77BN to short conveyor
Transfer from short conveyor to crusher feed conveyor
Transfer from crusher feed conveyor to crushers
Transfer from crushers to pug mill feed conveyor
Transfer from pug mill feed conveyor to pug mill
Transfer from pug mill to product conveyor
Transfer from product conveyor to Existing Conveyor 78N or 78S

Additional REF Material Handling System - Additive Handling

Pneumatic transfer from truck to silo
Transfer from silo to day bin
Transfer from day bin to screw conveyor
Transfer from screw conveyor to pug mill

- b. The permittee shall employ best available control measures for the coal and REF material handling operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee shall perform the following control measures to ensure compliance: maintain sufficient moisture to prevent fugitive dust, treat the coal with chemical stabilization/dust suppressants at sufficient frequencies, employ bin vent filters and maintain enclosures. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- c. For each coal and REF Material Handling System operation that is not adequately enclosed, the above-identified control measures 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the coal and REF Material Handling System operations until further observation confirms that use of the control measures is unnecessary.



- d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit are appropriate and sufficient to satisfy the best available control measures of ORC 3704.03(T).
- e. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than 10 tons per year. However, that rule revision has not yet been approved by US EPA as a revision to Ohio's SIP. Therefore, until the SIP revision occurs and the US EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emission limits/control measures no longer apply.
- f. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM-2.5 from this air contaminant source since the uncontrolled PTE for PM-2.5 is less than 10 tons/yr.

c) **Operational Restrictions**

- (1) The amount of coal processed through the REF Material Handling System shall not exceed 13,000,000 tons per year, based upon a rolling, 12-month summation.

The permittee has sufficient records to demonstrate compliance with the rolling 12-month summation.

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

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible particulate emissions from the material handling, conveying/transfer points listed in b)(2)a. and from the area immediately above the capture system serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the amount of coal processed through the REF Material Handling System, In tons;



- b. for the first 12 calendar months of operation following the issuance of this permit, the monthly cumulative amount of coal processed, in tons;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of coal processed through the REF Material Handling System, in tons; and
 - d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month PM-10 and PM-2.5 emission summations, in tons (calculated in accordance with the methods and procedures as outlined in permit application number A0045823as submitted on October 10, 2012 and the information recorded in d)(2)c above.
- (3) The owner or operator of a coal preparation and processing plant that commenced construction, reconstruction, or modification after April 28, 2008, shall maintain in a logbook (written or electronic) on-site and make it available upon request. The logbook shall record the following:
- a. The manufacturer's recommended maintenance procedures and the date and time of any maintenance and inspection activities and the results of those activities. Any variance from manufacturer recommendation, if any, shall be noted.
 - b. The date and time of periodic coal preparation and processing plant visual observations, noting those sources with visible emissions along with corrective actions taken to reduce visible emissions. Results from the actions shall be noted.
 - c. The amount and type of coal processed each calendar month.
 - d. The amount of chemical stabilizer or water purchased for use in the coal preparation and processing plant.
 - e. Monthly certification that the dust suppressant systems were operational when any coal was processed and that manufacturer's recommendations were followed for all control systems. Any variance from the manufacturer's recommendations, if any, shall be noted.

40 CFR Part 60, Subpart Y [40 CFR 60.258(a)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible emissions of fugitive dust were observed from the material handling, conveying/transfer points listed in b)(2)a. and the area immediately above the capture system serving this emissions unit; and



- b. any corrective actions taken to eliminate the visible emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 12-month restriction on the amount of coal processed through the REF Material handling System; and
 - b. all exceedances of the monthly (averaged over a 12 month rolling period) emission limitations for PM-10 and PM-2.5.

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (3) For the purpose of reports required under section 60.7(c), any owner operator subject to the provisions of this subpart also shall report semiannually periods of excess emissions as follows:

- a. All 6-minute average opacities that exceed the applicable standard.

40 CFR Part 60, Subpart Y (40 CFR 60.255(b)(3))

- (4) The owner or operator of an affected facility shall submit the results of initial performance tests to the Administrator or delegated authority, consistent with the provisions of section 60.8. The owner or operator who elects to comply with the reduced performance testing provisions of sections 60.255(c) or (d) shall include in the performance test report identification of each affected facility that will be subject to the reduced testing. The owner or operator electing to comply with section 60.255(d) shall also include information which demonstrates that the control devices are identical.

40 CFR Part 60, Subpart Y [40 CFR 60.258(c)]

- (5) After July 1, 2011, within 60 days after the date of completing each performance evaluation conducted to demonstrate compliance with this subpart, the owner or operator of the affected facility must submit the test data to EPA by successfully entering the data electronically into EPA's WebFIRE data base available at <http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main>. For performance tests that cannot be entered into WebFIRE (*i.e.*, Method 9 of appendix A-4 of this part opacity performance tests) the owner or operator of the affected facility must mail a summary copy to United States Environmental Protection Agency; Energy Strategies Group; 109 TW Alexander DR; mail code: D243-01; RTP, NC 27711.

40 CFR Part 60, Subpart Y [40 CFR 60.258(d)]

- (6) Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:



- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio EPA, Southeast District Office
Division of Air Pollution Control
2195 Front Street
Logan, Ohio 43138

f) Testing Requirements

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

- a. Emissions Limitation:

The permittee shall install a baghouse and/or bin vent filters designed to meet 0.010 grain PM/dscf of the exhaust gases.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Methods 1-5 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

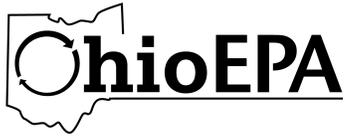
- a. Emissions Limitations:

Particulate matter 10 microns in diameter or less (PM-10) emissions shall not exceed 1.56 tons/month, averaged over a 12-month rolling period.

Particulate matter 2.5 microns in diameter or less (PM-2.5) emissions shall not exceed 0.24 ton/month, averaged over a 12-month rolling period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the PM-10 and PM-2.5 emission limitations above in accordance with the record keeping requirements in section d)(2).



b. Emissions Limitation:

The owner or operator must not cause to be discharged into the atmosphere from the affected facility any gases which exhibit 10 percent (%) opacity or greater.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.



2. F003, Paved and Unpaved Plant Roadways & Parking

Operations, Property and/or Equipment Description:

Plant and Landfill paved & unpaved roadways and parking areas. (P0111468 issued Final 5/8/2013. Chapter 31 Modification to Existing Roadways)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions. See b)(2)a. below.
b.	OAC rule 3745-17-07(B)(5)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
c.	OAC rule 3745-17-08(B)	This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

(2) Additional Terms and Conditions

a. The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approves the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee cannot begin using any modified Work Practice Plan until such time as the Southeast District Office approves the revised plan.



- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees paved and unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each segment of roadway or parking area for which the plan applies.
- b. A determination of the frequency that each roadway or parking area will be inspected to determine if additional control measures are needed.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:
 - i. Roadway or parking area segment inspected;
 - ii. Date inspected;
 - iii. Name of employee who either did the inspection or who can verify that the inspection was completed;
 - iv. Result of the inspection (needs treated or does not need treated);
 - v. A description of why no treatment was needed;
 - vi. Date treated;
 - vii. Name of employee who either treated the segment or who can verify that the segment was treated; and
 - viii. Method used to treat the segment.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approves the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Ohio EPA's southeast district Office (SEDO) for review and approval. The permittee can begin using the revised Work Practice Plan once the SEDO has approved its use.



- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
 - (3) The permittee shall maintain records of the following information:
 - a. The records required to be collected under the Work Practice Plan, and
 - b. The date and reason any element of the Work Practice Plan was not implemented.
- e) Reporting Requirements
- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the SEDO.
 - (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- 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. None.
- g) Miscellaneous Requirements
- (1) None.