



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
STARK COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 15-01468

DATE: 6/26/2001

Wheeling & Lake Erie Railway Co. Gamb.
Brian Beazer
100 East First Street
Brewster, OH 44613

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

Canton LAA



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 15-01468

Application Number: 15-01468
APS Premise Number: 1576001846
Permit Fee: **\$1000**
Name of Facility: Wheeling & Lake Erie Railway Co. Gamb.
Person to Contact: Brian Beazer
Address: 100 East First Street
Brewster, OH 44613

Location of proposed air contaminant source(s) [emissions unit(s)]:
2800 Gambrinus Road
Canton, Ohio

Description of proposed emissions unit(s):
Coal unloading and handling.

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

Wheeling & Lake Erie Railway Co. Gamb.
PTI Application: 15-01468
Issued: 6/26/2001

Facility ID: 1576001846

Part I - GENERAL TERMS AND CONDITIONS

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 Related to Monitoring and Recordkeeping 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, 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 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

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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 application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available 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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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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>
PM	46.9
PM10	44.225

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>Paved Roadways and Parking Areas</u>	<u>Applicable Rules/Requirements</u>
F001 - Roadways and Parking Areas Appendix A Area		OAC rule 3745-31-05(A)(3)

Unpaved Roadways and Parking Areas

OAC rule 3745-17-07(B)(7)(a)(ii)

OAC rule 3745-17-08(B)

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

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

Applicable Emissions
Limitations/Control Measures

PM emissions from roadways and parking areas shall not exceed 3.4 tons/yr.

PM₁₀ emissions from roadways and parking areas shall not exceed 0.725 ton/yr.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08(B).

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

Best available control measures shall be employed that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.a. through A.2.k).

There shall be no visible emissions of fugitive dust except for a period of time not to exceed one minute during any sixty-minute observation period.

Best available control measures that are sufficient to minimize or eliminate visible emission of fugitive dust (see sections A.2.a., A.2.c., A.2.d., A.2.f., A.2.g., A.2.h., A.2.i.,

A.2.j., and A.2.k.)

There shall be no visible emissions of fugitive dust except for a period of time not to exceed three minutes during any sixty-minute observation period.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b., A.2.e., A.2.f., A.2.g., A.2.i., A.2.j., and A.2.k.)

2. Additional Terms and Conditions

- 2.a** The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways:

All

paved parking areas:

All

- 2.b** The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways:

All

unpaved parking areas:

All

- 2.c** The permittee shall employ best available control measures on all paved roadways and parking areas 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 treat the paved roadways and parking areas by sweeping at sufficient treatment frequencies to ensure compliance. Dry sweeping without vacuum pickup is not permitted. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.d** The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways 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 treat the unpaved shoulders of all paved roadways with water and/or other suitable dust suppressants at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

Emissions Unit ID: **F001**

- 2.e** The permittee shall employ best available control measures on all unpaved roadways and parking areas 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 treat the paved roadways and parking areas with water and/or other suitable dust suppressants at sufficient treatment frequencies to ensure compliance. Dust suppressants other than water must receive prior approval by the Canton local air agency. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.f** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.g** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.h** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.i** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.j** A maximum speed limit of five (5) miles per hour shall be posted and enforced.
- 2.k** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restriction

None

C. Monitoring and/or Recordkeeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of the paved roadways and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
All	Daily

<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
All	Daily

- 2. The purpose of the inspections is to determine the need for implementing the above-mentioned 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 may, upon receipt of written approval from the Canton local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- 4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, 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 the total number of days where snow and/or ice cover or precipitation

were sufficient to not require the control measures.

The information required in 4.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall monitor and record on a monthly basis the number of vehicle miles traveled on both paved roadways and parking areas and unpaved roadways and parking areas.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports 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.
2. The 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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation
There shall be no visible emissions of fugitive dust except for a period of time not to exceed one minute during any sixty-minute observation period from paved roadways and parking areas.

Applicable Compliance Method

Compliance with the emission limitation for the paved roadways and parking areas 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.)

- b. Emissions Limitation
There shall be no visible emissions of fugitive dust except for a period of time not to exceed three minutes during any sixty-minute observation period from unpaved roadways and parking lots.

Applicable Compliance Method

Compliance with the emissions limitation for the unpaved roadways and parking areas 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.)

- c. Emissions Limitation
Total PM emissions from roadways and parking areas shall not exceed 3.4 tons/yr.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the vehicle miles traveled (VMT) per year on all roadways and parking areas for all vehicles times the 5.66 pounds/VMT emission factor (calculated in accordance with AP-42, 13.2.1) and dividing by 2,000 pounds/ton.

- d. Emission Limitation
Total PM₁₀ emissions from roadways and parking areas shall not exceed 0.725 ton/yr.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the vehicle miles traveled (VMT) per year on all paved roadways and parking areas for all vehicles times the 1.2 pounds/VMT emission factor (calculated in accordance with AP-42, 13.2.1) and dividing by 2,000 pounds/ton.

F. Miscellaneous Requirements

1. This permit supercedes PTI 15-1278 issued on October 22, 1997.

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>	piles (see section A.2.a for identification of storage piles)	<u>Applicable Rules/Requirements</u>
F002 - Coal storage piles		OAC rule 3745-31-05(A)(3)
	wind erosion from storage piles (see section A.2.a for identification of storage piles)	OAC rule 3745-17-07(B)(5)
		OAC rule 3745-17-08(B)
load-in and load-out of storage		OAC rule 3745-31-05(A)(3)

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

Applicable Emissions
Limitations/Control Measures

PM emissions shall not exceed 21.5 tons/yr from wind erosion and load-in and load-out operations.

PM₁₀ emissions shall not exceed 21.5 tons/yr from wind erosion and load-in and load-out operations.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08(B).

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

Best available control measures shall be employed that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.a. through A.2.g).

There shall be no visible emissions of fugitive dust except for a period of time not to exceed one minute during any sixty-minute observation period.

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.a., A.2.b., A.2.c., A.2.f., and A.2.g.)

There shall be no visible emissions of fugitive dust except for a period of time not to exceed one minute during any sixty-minute observation period.

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.a., A.2.d., A.2.e., A.2.f., and A.2.g.)

2. Additional Terms and Conditions

2.a The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

- coal piles

2.b The permittee shall employ best available control measures for all load-in and load-out operations associated with the 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 using a mobile conveyor/ stacker and watering the storage piles as needed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c The above-mentioned control measures shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measure is unnecessary.

2.d 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 watering the storage piles as needed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The above-mentioned control measures 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures 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.

2.f The average stockpile height shall not exceed 70 feet and the maximum height at any time shall not exceed 100 feet.

2.g Implementation of the above-mentioned control measures in accordance with the terms

and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
- coal	daily

- 2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
- coal	daily

- 3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
- coal	daily

- 4. 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.

- 5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile and for wind erosion from the

surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

6. The permittee may, upon receipt of written approval from the Canton local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
7. 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 measure(s);
 - c. the dates the control measure(s) were implemented;
 - d. on a calendar quarter basis, the total number of days the control measure(s) 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 measures; and
 - e. the approximate heights of each coal pile.

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation (exceedance) reports 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.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the limitations that the average stockpile height shall not exceed 70 feet and the maximum height at any time shall not exceed 100 feet.
3. The 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 specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation

There shall be no visible emissions of fugitive dust except for a period of time not to exceed one minute during any sixty-minute observation period.

Applicable Compliance Method

Compliance with the visible emission limitations 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.

- b. Emissions Limitation

PM emissions shall not exceed 21.5 tons/yr from wind erosion and load-in and load-out operations.

Applicable Compliance Method

Compliance with the above annual particulate emission limitation shall be determined by the following equations:

Emission factor from RACM Table 2.4-1

Loading onto pile	0.08 lb PM/ton coal
Vehicular traffic	0.16 lb PM/ton coal
Loading out	0.10 lb PM/ton coal
Wind erosion	0.09 lb PM/ton coal
Total	0.43 lb PM/ton coal

Wheeling & Lake Erie Railway Co. Gamb.

PTI Application: 15-01468

Issued

Facility ID: 1576001846

Emissions Unit ID: **F002**

$0.43 \text{ lb PM/ton} \times 500,000 \text{ tons coal/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \times 0.2 \text{ (controls)} = 21.5 \text{ tons PM/yr}$

- c. Emissions Limitation
PM10 emissions shall not exceed 21.5 tons/yr from wind erosion and load-in and load-out operations.

Applicable Compliance Method

Compliance with the above annual particulate emission limitation shall be determined by the following equations:

Emission factor from RACM Table 2.4-1

Loading onto pile	0.08 lb PM/ton coal
Vehicular traffic	0.16 lb PM/ton coal
Loading out	0.10 lb PM/ton coal
Wind erosion	0.09 lb PM/ton coal
Total	0.43 lb PM/ton coal

$0.43 \text{ lb PM/ton} \times 500,000 \text{ tons coal/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \times 0.2 \text{ (controls)} = 21.5 \text{ tons PM/yr}$

F. Miscellaneous Requirements

1. This permit supercedes PTI 15-1278 issued on October 22, 1997.

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>Applicable Rules/Requirements</u>
F003 - Unloading of coal from railcars onto a conveyor which deposits the coal onto storage piles and loading of coal from storage piles using front end loaders into trucks. At times coal will be unloaded from railcars onto a conveyor and then directly loaded into trucks.	OAC rule 3745-31-05(A)(3)
Appendix A Area	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)

Wheel**PTI A****Issued: 6/26/2001**Emissions Unit ID: **F003**

Applicable Emissions
Limitations/Control Measures

PM emissions shall not exceed 22 tons/yr.

PM₁₀ emissions shall not exceed 22 tons/yr.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1) and 3745-17-08(B).

The opacity of visible emissions of fugitive dust from the following coal handling operations shall not exceed twenty percent, as a three minute average:

- a. rail car bottom dumping;
- b. front end loader loading of trucks;
- c. transfer points of conveyor; and
- d. dumping from conveyor onto storage piles.

Best available control measures shall be employed that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.a. through A.2.c).

2. Additional Terms and Conditions

- 2.a** 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:

material handling operation(s)

ALL

control measure(s)

Apply sufficient water or chemical dust suppressant at the unloading station to control dust emissions from all subsequent conveyors and transfer points.

Treat each coal storage pile with water and/or any other suitable dust suppression chemicals to control dust emissions during subsequent handling and truck loading and unloading operations, use of front-end loaders, and minimize drop height distance.

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

- 2.b** 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.c** Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

B. Operational Restrictions

1. No more than 41,667 tons of coal may be unloaded in any month.

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 inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
ALL	Daily

- 2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
- 3. The permittee may, upon receipt of written approval from the Canton local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- 4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and,
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

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 maintain monthly record on the tons of coal unloaded.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports 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 deviation (excursion) reports that identify any month in which more than 41,667 tons of coal were unloaded and the actual amount of coal unloaded on any such month.
 3. The 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 specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation
The opacity of visible emissions of fugitive dust from the following coal handling operations shall not exceed twenty percent, as a three minute average:
 - a. rail car bottom dumping;
 - b. front end loader loading of trucks;
 - c. transfer points of conveyor; and
 - d. dumping from conveyor onto storage piles.

Applicable Compliance Method

Compliance with the visible emission limitations for the storage piles 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.

- b. Emissions Limitation
PM emissions shall not exceed 22 tons/yr.

Applicable Compliance Method

Compliance with the above annual particulate emission limitation shall be determined by the following equations:

Emission factor from RACM Table 1.4-1

Wheeling & Lake Erie Railway Co. Gamb.

PTI Application: 15-01468

Issued

Facility ID: 1576001846

Emissions Unit ID: F003

Railcar unloading	0.4 lb PM/ton coal
Transfer and conveying	0.04 lb PM/ton coal
Total	0.44 lb PM/ton coal

$0.44 \text{ lb PM/ton} \times 500,000 \text{ tons coal/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \times 0.2 \text{ (controls)} = 22 \text{ tons PM/yr}$

- c. Emissions Limitation
PM10 emissions shall not exceed 22 tons/yr.

Applicable Compliance Method

Compliance with the above annual particulate emission limitation shall be determined by the following equations:

Emission factor from RACM Table 1.4-1

Railcar unloading	0.4 lb PM/ton coal
Transfer and conveying	0.04 lb PM/ton coal
Total	0.44 lb PM/ton coal

$0.44 \text{ lb PM/ton} \times 500,000 \text{ tons coal/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \times 0.2 \text{ (controls)} = 22 \text{ tons PM/yr}$

2. Compliance with the operational limitations specified in section B of these terms and conditions shall be determined in accordance with the following methods:
 - a. Operational Limitation
No more than 41,667 tons of coal may be unloaded in any month.

Applicable Compliance Method
Records of the amount of coal unloaded is required in section C.5.

F. Miscellaneous Requirements

1. This permit supercedes PTI 15-1278 issued on October 22, 1997.

NEW SOURCE REVIEW FORM B

PTI Number: 15-01468 Facility ID: 1576001846
 FACILITY NAME Wheeling & Lake Erie Railway Co. Gamb.
 FACILITY DESCRIPTION Coal unloading and handling. CITY/TWP Canton
 SIC CODE 3295 SCC CODE ??? EMISSIONS UNIT ID F001
 EMISSIONS UNIT DESCRIPTION Plant roadways and parking areas.
 DATE INSTALLED June 2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				3.4
PM ₁₀	Attainment				0.725
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Dust suppressants on unpaved roadways and parking areas. Sweeping of paved roadways and parking areas.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 15-01468 Facility ID: 1576001846

FACILITY NAME Wheeling & Lake Erie Railway Co. Gamb.

FACILITY DESCRIPTION Coal unloading and handling. CITY/TWP Canton

Emissions Unit ID: **F003**

SIC CODE 3295 SCC CODE 30510303 EMISSIONS UNIT ID F002

EMISSIONS UNIT DESCRIPTION Coal storage piles

DATE INSTALLED June 2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				21.5
PM ₁₀	Attainment				21.5
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination If required application of dust suppressants. Minimum drop heights.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

3 NEW SOURCE REVIEW FORM B

PTI Number: 15-01468

Facility ID: 1576001846

FACILITY NAME Wheeling & Lake Erie Railway Co. Gamb.

FACILITY DESCRIPTION Coal unloading and handling.

CITY/TWP Canton

Emissions Unit ID: **F003**

SIC CODE

3295

SCC CODE

30510403

EMISSIONS UNIT ID

F003

30510503

EMISSIONS UNIT DESCRIPTION

Coal handling

DATE INSTALLED

June 2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				22
PM ₁₀	Attainment				22
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Water sprays if required.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

YES

X

NO

IDENTIFY THE AIR CONTAMINANTS: