



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

3/21/2016

Jerame Schwing
 The Ohio Valley Coal Company - Powhatan No. 6 Mine
 46226 National Road
 St. Clairsville, OH 43950

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0607000089
 Permit Number: P0113591
 Permit Type: Renewal
 County: Belmont

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 77 South High Street, 17th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-SEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for**

The Ohio Valley Coal Company - Powhatan No. 6 Mine

Facility ID:	0607000089
Permit Number:	P0113591
Permit Type:	Renewal
Issued:	3/21/2016
Effective:	3/21/2016
Expiration:	3/21/2026



Division of Air Pollution Control
Permit-to-Install and Operate
for
The Ohio Valley Coal Company - Powhatan No. 6 Mine

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Authorization

Facility ID: 0607000089
Application Number(s): M0001834, M0001852, M0002160, A0054946
Permit Number: P0113591
Permit Description: This permit-to-install and operate serves to incorporate updated calculations and transition the facility from Title V to non-Title V. This permit is for roadways and parking areas, storage piles, and coal processing.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/21/2016
Effective Date: 3/21/2016
Expiration Date: 3/21/2026
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

The Ohio Valley Coal Company - Powhatan No. 6 Mine
56854 Pleasant Ridge Road
Alledonia, OH 43902-9716

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0113591

Permit Description: This permit-to-install and operate serves to incorporate updated calculations and transition the facility from Title V to non-Title V. This permit is for roadways and parking areas, storage piles, and coal processing.

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:	Roadways and parking areas
Superseded Permit Number:	P0107896
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	Coal & coal refuse storage piles
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	Coal & coal refuse material handling
Superseded Permit Number:	P0107896
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
The Ohio Valley Coal Company - Powhatan No. 6 Mine
Permit Number: P0113591
Facility ID: 0607000089
Effective Date: 3/21/2016

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. Emissions unit F003 contained in this permit is subject to 40 CFR Part 60, Subpart Y. The complete NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulation (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



Final Permit-to-Install and Operate
The Ohio Valley Coal Company - Powhatan No. 6 Mine
Permit Number: P0113591
Facility ID: 0607000089
Effective Date: 3/21/2016

C. Emissions Unit Terms and Conditions



1. F001, Roadways and parking areas

Operations, Property and/or Equipment Description:

Unpaved roadways and parking areas in the coal prep plant area (EU F001 installed in 1972) and paved and unpaved roadways and parking areas in the clean coal area (EU F004 added after 1974) with a maximum annual VMT of 28,406 miles/year for paved roadways and parking areas and 55,431 miles/year for unpaved roadways and parking areas; renewal and administrative modification to correct calculations and transition the facility to non-TV; supersedes PTIO P0107896, issued final July 8, 2011

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)	Fugitive particulate emissions (PE) shall not exceed 17.20 tons per year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B) and 3745-17-08(B).
b.	OAC rule 3745-17-07(B)(4) <i>Paved roadways and parking areas</i>	No visible PE except for six minutes during any 60-minute period.
c.	OAC rule 3745-17-07(B)(5) <i>Unpaved roadways and parking areas</i>	No visible PE except for 13 minutes during any 60-minute period.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a. through h. below.

(2) Additional Terms and Conditions

a. The following paved and unpaved parking roadways and parking areas are covered by this permit and subject to the requirements of OAC rules 3745-31-05(A)(3), 3745-17-07(B) and 3745-17-08(B):

All unpaved roadways and parking areas in the preparation plant area

All paved roadways and parking areas in the clean coal area

All unpaved roadways and parking areas in the clean coal area

- b. The permittee shall employ reasonably 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 unpaved roadways and parking areas with water and/or any other suitable dust suppressants at sufficient treatment frequencies and to enforce a maximum speed limit of 15 mph to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The permittee shall employ reasonably 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 use a wheel washer, to vacuum sweep, to flush the paved roadways and parking areas with water and/or any other suitable dust suppressants at sufficient treatment frequencies, and to enforce a maximum speed limit of 15 mph to ensure compliance to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. 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 an unpaved 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.
- e. 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 of no visible PE except for a period of time not to exceed six minutes during any sixty-minute observation period.



- f. 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.
- g. 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.
- h. 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 3745-31-05(A)(3) and 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each unpaved roadway segment and each parking area in accordance with the following frequencies:

<u>Unpaved roadways</u>	<u>Minimum inspection frequency</u>
All clean coal and preparation plant roadways and parking areas	Daily
<u>Paved roadways</u>	<u>Minimum inspection frequency</u>
All clean coal area roadways	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 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 d)(3)d. shall be kept separately for (i) the unpaved roadways, (ii) the paved roadways, and (iii) the unpaved parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) 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.
- (2) 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 twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emissions Limitation:

Fugitive PE shall not exceed 17.20 tons per year.

Applicable Compliance Method:

Compliance with annual emissions limitations shall be determined based on the emission factor calculations for paved and unpaved roadways and parking areas in AP-42 section 13.2.1 (paved; 1/11), and 13.2.2 (unpaved; 11/06). Initial compliance has been determined utilizing inputs provided by the permittee in their application as follows:

Unpaved sections:

$$EF = ((k \times (s/12)^a \times (W/3)^b) / (365-p)) / 365$$

Where:

EF = size-specific emission factor (lb/VMT)

$$k \text{ (lb/VMT)} = 4.9$$

$$a = 0.7$$

$$b = 0.45$$

$$s = \% \text{ surface material silt content} = 8.4$$



W = mean vehicle weight (tons) = 118.63

p = number of rain days per year >0.01 in. = 145

Therefore, EF = 12.039 lb/VMT

Maximum travel = 55,461 VMT/year

$(55,461 \text{ VMT/year})(12.039 \text{ lb/VMT})(1 \text{ ton}/2,000 \text{ lbs}) = 333.80 \text{ TPY uncontrolled PE}$

Assume 95% control efficiency for implementation of BACM (Ohio EPA's GP for roadways)

$(333.80)(1-0.95) = 16.69 \text{ TPY controlled PE}$

Paved sections:

$EF = ((k*(sL)^{0.91}) \times (W)^{1.02} + C) \times (1-P/(4 \times 365))$

Where:

EF = particulate emission factor (lb/VMT)

k = particle size multiplier (lb/VMT) = 0.011

sL = road surface silt loading (g/m²) = 8.2

W = mean vehicle weight (tons) = 10.10

P = number of rain days per year >0.01 in. = 145

Therefore, EF = 0.712 lb/VMT

Maximum travel = 28,406 VMT/year

$(28,406 \text{ VMT/year})(0.712 \text{ lb/VMT})(1 \text{ ton}/2,000 \text{ lbs}) = 10.11 \text{ TPY uncontrolled PE}$

Assume 95% control efficiency for implementation of BACM (Ohio EPA's GP for roadways)

$(10.11 \text{ TPY})(1-0.95) = 0.51 \text{ TPY controlled PE}$

Total fugitive PE = 16.69 TPY + 0.51 TPY = 17.20 tons per year

b. Emissions Limitation:

No visible PE except for six minutes during any 60-minute period.



Applicable Compliance Method:

If required, visible emissions of fugitive dust shall be determined according to USEPA Method 22, with the modifications found in OAC rule 3745-17-03(B)(4).

c. Emissions Limitation:

No visible PE except for 13 minutes during any 60-minute period.

Applicable Compliance Method:

If required, visible emissions of fugitive dust shall be determined according to USEPA Method 22, with the modifications found in OAC rule 3745-17-03(B)(4).

g) Miscellaneous Requirements

- (1) None.

2. F002, Coal & coal refuse storage piles

Operations, Property and/or Equipment Description:

Storage piles of raw coal with an average surface area of 2.5 acres and a max load-in and load-out rate of 10,000,000 tons/year, clean coal with an average surface area of 2.21 acres and a max load-in rate of 7,000,000 tons per year and a max load out rate of 6,090,000 tons per year, and refuse with an average surface area of 59.0 acres and a max load-in rate of 3,000,050 tons per year (no load-out activities for refuse)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-07(B)(6)	No visible particulate emissions (PE) from any material storage pile except for a period of time not to exceed thirteen minutes during any sixty-minute observation period, except as provided by rule.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate emissions of fugitive dust. See b)(2)a.-d.

(2) Additional Terms and Conditions

- a. The storage piles that are covered by this permit and subject to the following requirements are listed below:

Raw coal

Clean Coal

Refuse

- b. The permittee shall employ reasonably available control measures on all load-in and load-out operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measures to ensure compliance:

Reduced drop heights for all piles

Inherent moisture content of coal for all piles

Application of crusting agents to clean coal pile

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

- c. The permittee shall employ reasonably 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 perform the following control measures to ensure compliance:

Reduced drop heights for all piles

Inherent moisture content of coal for all piles

Application of crusting agents to clean coal pile

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

- d. 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 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.

- e. 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 rule 3745-17-08(B).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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>
Raw Coal	Daily
Clean Coal	Daily
Refuse	Daily

- (2) 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>
Raw Coal	Daily
Clean Coal	Daily
Refuse	Daily

- (3) 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>
Raw Coal	Daily
Clean Coal	Daily
Refuse	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 wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

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

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

The information required in d)(6)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.

e) Reporting Requirements

- (1) 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.
- (2) 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 twelve 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. Emissions Limitation:

No visible PE from any material storage pile except for a period of time not to exceed thirteen minutes during any sixty-minute observation period, except as provided by rule.

Applicable Compliance Method

If required, visible PE shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

- (1) None.

3. F003, Coal & coal refuse material handling

Operations, Property and/or Equipment Description:

Coal and coal refuse material handling with a maximum annual throughput of 11,350,400 tons; includes conveyors, screening (rated at 3,400 tons/hour) and transfer systems for moving raw coal from the underground mine to the prep plant and removing clean coal and coal refuse from the prep plant, loading of clean coal into rail cars and trucks, and unloading of raw and clean coal from trucks (total of 19 transfer points); renewal and administrative modification to correct calculations and transition the facility to non-TV; supersedes PTIO P0107896, issued final July 8, 2011

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)	Fugitive particulate emissions (PE) shall not exceed 10.01 tons per year. Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a. through f. below.
b.	OAC rule 3745-17-07(B)	The requirements specified in these rules are equivalent to the requirements established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-08(B)	The requirements specified in these rules are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 60, Subpart Y (40 CFR 60.250 – 60.258)	The emissions limitation established pursuant to this rule is less stringent than the emissions limitation established



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>[In accordance with 40 CFR 60.250(b), this emissions unit includes coal processing and conveying equipment and coal transfer and loading systems that commenced construction, reconstruction or modification after October 27, 1974 and on or before April 28, 2008, and includes coal processing and conveying equipment and coal transfer and loading systems that commenced construction, reconstruction or modification after April 28, 2008, processing more than 200 tons of coal per day, subject to the emissions limitations specified in this section.]</p>	<p>pursuant to OAC rule 3745-31-05(A)(3). [40 CFR 60.254(a)]</p> <p>See b)(2)g. below.</p> <p>The owner or operator shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal constructed, reconstructed, or modified after April 28, 2008, gases which exhibit 10% or greater. [40 CFR 60.254(b)(1)]</p> <p>See b)(2)h. below.</p>
e.	40 CFR 60.1-19 (40 CFR 60.1a)	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:

Screening ROM (3,400 TPH, 11,350,400 TPY)

Transfer Points:

TP A: Belt Unload - Raw Coal Stacker (3,400 TPH, 11,000,000 TPY)

TP B: Belt Load - Raw Coal (1,700 TPH, 11,000,000 TPY)

TP C: Belt to Belt Transfer – Clean Coal (1,200 TPH, 7,700,000 TPY)

TP D: Belt Unload – Clean Coal Stacker (1,200 TPH, 7,700,000 TPY)

TP E: Belt Load – Clean Coal to Rock Bin Train LO (4,000 TPH, 6,699,000 TPY)

TP F: Belt Unload – Clean Coal to Rock Bin Train LO (4,000 TPH, 6,699,000 TPY)

TP G: Rock Bin Unload – Clean Coal to Train LO (4,000 TPH, 6,699,000 TPY)

TP H: Belt Load – Clean Coal to Truck (1,400 TPH, 1,001,000 TPY)

TP I: Belt Unload – Clean Coal to Truck (1,400 TPH, 1,001,000 TPY)

TP J1; Belt to Bin Transfer – Refuse (450 TPH, 3,300,000 TPY)

TP J2: Bin to Belt Transfer – Refuse (450 TPH, 3,300,000 TPY)

TP K: Belt Unload – Refuse to Rock Bin (450 TPH, 3,300,000 TPY)

TP L: Unload – Rock Bin Refuse to Trucks (450 TPH, 3,300,000 TPY)

TP M: Truck Unloading Refuse (450 TPH, 3,300,000 TPY)

TP O: ROM slope conveyor - Scalp Screener (3,400 TPH, 11,350,400 TPY)

TP P: Scalp Screener - Raw Coal Conveyor (3,400 TPH, 11,000,000 TPY)

TP R: Scalp Screener Load Refuse to Bin (50 TPH, 350,400 TPY)

TP S: Scalp Bin Refuse to Trucks (50 TPH, 350,400 TPY)

TP T: Truck Unloading Scalp Refuse (50 TPH, 350,400 TPY)

- b. The permittee shall employ best available control measures for the material handling operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee has committed to perform the following control measures to ensure compliance: maintain sufficient moisture to prevent fugitive dust, treat the coal with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies, maintain enclosures, and minimize drop height. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- d. The permittee shall not overload trucks hauling refuse so as to eliminate spillage, along with maintaining a minimum dump height from refuse bin into trucks, in order to minimize or eliminate the visible emissions of fugitive dust.



- e. The permittee shall continue to maintain covers on all conveyors and the belts shall not be overloaded in order to minimize or eliminate the visible emissions of fugitive dust.
- f. 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 and/or 3745-17-08(B).
- g. In accordance with 40 CFR Part 60 Subpart Y, the following pieces of equipment are affected facilities constructed, modified, or reconstructed before April 28, 2008. The material handling operations that are covered by this permit and subject to the NSPS requirements are listed below:

2200' coal refuse conveyor

New coal refuse bin

Clean coal truck loading station #1

- h. In accordance with 40 CFR Part 60 Subpart Y, the following pieces of equipment are affected facilities constructed, modified, or reconstructed after May 27, 2009. The material handling operations that are covered by this permit and subject to the NSPS requirements are listed below:

Clean coal truck loading station #2

c) Operational Restrictions

- (1) None.

d) 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>
Screening ROM	Daily
TP A: Belt Unload - Raw Coal Stacker	Daily
TP B: Belt Load - Raw Coal	Daily
TP C: Belt to Belt Transfer – Clean Coal	Daily
TP D: Belt Unload – Clean Coal Stacker	Daily
TP E: Belt Load – Clean Coal to Rock Bin Train LO	Daily
TP F: Belt Unload – Clean Coal to Rock Bin Train LO	Daily



TP G: Rock Bin Unload – Clean Coal to Train LO	Daily
TP H: Belt Load – Clean Coal to Truck	Daily
TP I: Belt Unload – Clean Coal to Truck	Daily
TP J1; Belt to Bin Transfer – Refuse	Daily
TP J2: Bin to Belt Transfer – Refuse	Daily
TP K: Belt Unload – Refuse to Rock Bin	Daily
TP L: Unload – Rock Bin Refuse to Trucks	Daily
TP M: Truck Unloading Refuse	Daily
TP O: ROM slope conveyor - Scalp Screener	Daily
TP P: Scalp Screener - Raw Coal Conveyor	Daily
TP R: Scalp Screener Load Refuse to Bin	Daily
TP S: Scalp Bin Refuse to Trucks	Daily
TP T: Truck Unloading Scalp Refuse	Daily

- (2) The above-mentioned inspections shall be performed during representative, normal operating conditions.
- (3) 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 d)(3)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.

e) Reporting Requirements

- (1) 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.

- (2) 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 twelve months for each air contaminant source identified in this permit.
- (3) Unless documentation can be submitted to demonstrate that these requirements have been met, the permittee shall submit notifications and reports to the appropriate Ohio EPA District office as required pursuant to 40 CFR Part 60, Subparts A and Y for the clean coal truck loading station (former EU F007) per the following sections:

60.7(a)(1)	Notification of date of construction or reconstruction of an affected facility
60.7(a)(3)	Notification of the actual date of initial startup of an affected facility
60.7(a)(4)	Notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in §60.14(e).
60.7(a)(6)	Notification of the anticipated date for conducting the opacity observations required by §60.11(e)(1).

f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emissions Limitation:

Fugitive PE shall not exceed 10.01 tons per year.

Applicable Compliance Method:

Compliance is demonstrated through the use of the following equations:

$$\text{TPY Fugitive PE} = [(EF_{\text{TP-A}}) * (\text{maximum annual throughput}_{\text{TP-A}}) + (EF_{\text{TP-B}}) * (\text{maximum annual throughput}_{\text{TP-B}}) + (EF_{\text{TP-C}}) * (\text{maximum annual throughput}_{\text{TP-C}}) + (EF_{\text{TP-D}}) * (\text{maximum annual throughput}_{\text{TP-D}}) + (EF_{\text{TP-E}}) * (\text{maximum annual throughput}_{\text{TP-E}}) + (EF_{\text{TP-F}}) * (\text{maximum annual throughput}_{\text{TP-F}}) + (EF_{\text{TP-G}}) * (\text{maximum annual throughput}_{\text{TP-G}}) + (EF_{\text{TP-H}}) * (\text{maximum annual throughput}_{\text{TP-H}}) + (EF_{\text{TP-I}}) * (\text{maximum annual throughput}_{\text{TP-I}}) + (EF_{\text{TP-J1}}) * (\text{maximum annual throughput}_{\text{TP-J1}}) + (EF_{\text{TP-J2}}) * (\text{maximum annual throughput}_{\text{TP-J2}}) + (EF_{\text{TP-K}}) * (\text{maximum annual throughput}_{\text{TP-K}}) + (EF_{\text{TP-L}}) * (\text{maximum annual throughput}_{\text{TP-L}}) + (EF_{\text{TP-M}}) * (\text{maximum annual throughput}_{\text{TP-M}})]$$



$$\text{throughput}_{TP-M}) + (EF_{TP-O}) * (\text{maximum annual throughput}_{TP-O}) + (EF_{TP-P}) * (\text{maximum annual throughput}_{TP-P}) + (EF_{TP-R}) * (\text{maximum annual throughput}_{TP-R}) + (EF_{TP-S}) * (\text{maximum annual throughput}_{TP-S}) + (EF_{TP-T}) * (\text{maximum annual throughput}_{TP-T}) + (EF_{\text{screen}}) * (\text{maximum annual throughput}_{\text{Screen}})] / 2,000 \text{ lbs/ton}$$

Where,

$$EF_{TP} \text{ and } EF_{\text{Screen}} = k(0.0032)((U/5)^{1.3}/(M/2)^{1.4}) \quad [\text{from AP-42, 13.2.4 (11/06)}]$$

Where,

$$k = 0.0032$$

U = 8.7 mph for screening and all transfer points except TP-C

U = 1.0 mph for TP-C

M = 6.33% for raw coal, 6.76% for clean coal, and 6.20% for refuse

Maximum annual throughput_{TP-A, TP-B and TP-P} = 11,000,000 tons/year

Maximum annual throughput_{TP-C and TP-D} = 7,700,000 tons/year

Maximum annual throughput_{TP-E, TP-F, and TP-G} = 6,699,000 tons/year

Maximum annual throughput_{TP-H and TP-I} = 1,001,000 tons/year

Maximum annual throughput_{TP-J1, TP-J2, TP-K, TP-L and TP-M} = 3,300,000 tons/year

Maximum annual throughput_{TP-O} = 11,350,400 tons/year

Maximum annual throughput_{TP-R, TP-S, and TP-T} = 350,400 tons/year

Maximum annual throughput_{Screen} = 11,350,400 tons/year

b. Emissions Limitation:

Visible PE shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

c. Emissions Limitations:

The owner or operator shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal constructed, reconstructed, or modified after April 28, 2008, gases which exhibit 10% or greater.



Applicable Compliance Method:

Visible particulate emissions shall be conducted in accordance with 40 CFR 60.8 and the methods identified in §60.257 (US EPA Method 9).

g) Miscellaneous Requirements

- (1) 40 CFR Part 60, Subpart Y applies to the truck load-out station (former EU F007) added in the late 1980's and to the 2,200 ft. coal refuse conveyor and rock bin installed as a modification to EU F003 in 2006. The notification requirements in 40 CFR 60.7 were met for the 2006 modification by the letter received by the Ohio EPA, Southeast District Office on August 14, 2006. The performance test required by 40 CFR 60.8 for the coal refuse conveyor and rock bin was completed on September 7, 2006. Based on a review of the test report received on November 3, 2006, the permittee has demonstrated compliance with the visible PE limitation specified in 40 CFR Part 60.254(a). This testing also documented compliance with the visible PE limitation specified by OAC rule 3745-31-05(A)(3) for the 2,200 ft. coal refuse conveyor and rock bin installed in 2006. The performance test required by 60.8 for the clean coal truck loading station #2 was completed October 17, 2012, demonstrating compliance with the visible PE limitation specified in 40 CFR Part 60.254(b)(1).