

Harrison
DTE

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State of Ohio Environmental Protection Agency
S.E.D.O.

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122 S. Front Street
Columbus, OH 43215

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P.O. Box 1049
Columbus, OH 43216-1049

2006 APR 24 AM 10:02

04/19/06

CERTIFIED MAIL
RE: Final Chapter 3745-35 Permit To Operate

**F003 (Coal Recovery and Cleaning) Coal
Recovery and Cleaning - Facility reopened in
2002.**

DTE Dickerson LLC (06-34-00-0085)
Katie Panczak
414 S Main St.
Ann Arbor, MI 48104

Dear Katie Panczak:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them 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 Compliance Assistance and Pollution Prevention at (800) 329-7518. For more information related to air pollution control in Ohio, visit www.epa.state.oh/dapc.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's 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. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact Southeast District Office.

Sincerely,

Michael W. Ahern

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

cc: Southeast District Office

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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - 145 TPH (wet product) Coal Recovery and Cleaning Process	OAC rule 3745-31-05(A)(3) (PTI 06-07659 issued 9/8/05)	<p>Particulate emissions (PE) shall not exceed 0.2 TPY. See section A.2.a.</p> <p>Volatile Organic Compounds (VOC) emissions shall not exceed 218 lbs/day, and 40.0 TPY (which includes 30.2 TPY hydrotreated petroleum distillates classified as air toxic material).</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR Part 60, Subpart Y.</p>
	OAC rule 3745-21-07(G)(2)	See section A.2.d.
	40 CFR Part 60, Subpart Y	The permittee shall not cause to be discharged into the atmosphere, gases which exhibit 20 percent opacity or greater. See section A.2.c.
	OAC rule 3745-17-07(B)(1)	See section A.2.b.
	OAC rule 3745-17-08(B)	See section A.2.b.

2. Additional Terms and Conditions

- 2.a The 0.2 ton per year PE emission limitation was established for PTI purposes to reflect the emission unit's potential to emit. This emissions unit processes coal slurry which is too wet to generate fugitive dust but because of NSPS applicability is not eligible for the de minimis exemption in OAC rule 3745-15-05. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b This facility is located in Harrison County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

2. Additional Terms and Conditions (continued)

- 2.c The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.d The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that include the following information for this emissions unit:
 - a. the company identification of each VOC-containing material employed and documentation as to whether or not each VOC-containing material employed is a photochemically reactive material as defined in OAC rule 3745-21-05(C)(5);
 - b. the number of gallons of each VOC-containing material employed;
 - c. the VOC content of each VOC-containing material employed, in pounds of VOC per gallon of VOC-containing material; and
 - d. the total daily VOC emissions, in lbs/day.
2. The permit to install for this emissions unit F003 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hydrotreated petroleum distillates, CAS # 64742-47-8
TLV (ug/m3): 200,000
Maximum Hourly Emission Rate (g/s): 0.87
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,422
MAGLC (ug/m3): 4,762
3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs, Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices";
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

C. Monitoring and/or Record Keeping Requirements (continued)

4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify each day a photochemically reactive material was employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 218 lbs/day, and the actual daily VOC emissions for each such day.

E. Testing Requirements

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

1.a Emission Limitation:

PE shall not exceed 0.2 ton per year.

Applicable Compliance Method:

Compliance with the TPY emission limitation shall be demonstrated by the following calculations using emission factors from AP 42, Compilation of Air Pollutant Emission Factors, Chapter 13.2.4, Equation 1 (issued 1/95).

$$\text{Material transfer: } EF = (k) (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

where:

EF = emission factor (lb. PE / ton coal transferred);
k = particle size multiplier (0.74 dimension less);
U = mean wind speed, miles per hour (10 mph);
M = material moisture content (15%);
Control efficiency = 75%; and
Maximum Annual throughput = 1,270,200 tons (wet).

$$EF = (0.74) (0.0032) [(10/5)^{1.3} / (15/2)^{1.4}] = 3.47 \times 10^{-4}$$

$$PE = EF \times (3 \text{ transfers})(1,270,200 \text{ max tpy})(0.0005 \text{ ton/lb})(1-0.75) = 0.17 \text{ TPY}$$

E. Testing Requirements (continued)

1.b Emission Limitation:

VOC emissions shall not exceed 218 lbs/day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the VOC-containing materials.

1.c Emission Limitation:

The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.

1.d Emission Limitation:

The permittee shall not cause to be discharged into the atmosphere, gases which exhibit 20 percent opacity or greater.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002, with the modifications found in OAC rule 3745-17-03(B)(4).

F. Miscellaneous Requirements

None