



State of Ohio Environmental Protection Agency

Harrison  
DTE  
cc

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

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2006 APR 24

TELE: (614) 644-3020 FAX: (614) 644-2329  
AM 10:03

04/19/06

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

F002 (Coal Storage Piles) Coal Feedstock and  
Product Storage Piles - 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](http://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  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Southeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 04/19/06

Expiration Date: 04/19/11

This document constitutes issuance to:

Facility ID: 06-34-00-0085  
DTE Dickerson LLC  
79285 Cadiz-New Athens Road  
Cadiz, OH 43907

of a permit to operate for:

F002 (Coal Storage Piles)  
Coal Feedstock and Product Storage Piles - Facility reopened in 2002.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Joseph P. Koncelik  
Director

## Part I: General Terms and Conditions

### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. 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.)

### 4. 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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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 ca           ists for modifying, reopening or re            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>
F002 - Coal feedstock (250 TPH) and product storage piles.	OAC rule 3745-31-05(A)(3) (PTI 06-07659 issued 9/8/05)	No visible particulate emissions (PE) of fugitive dust except for 1 minute during any 60-minute period.
		Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. (See sections A.2.b through A.2.f.)
		PE shall not exceed 2.43 TPY.
	OAC rule 3745-17-07(B)(1)	See section A.2.g.
	OAC rule 3745-17-08(B)	See section 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(A)(3) are listed below:

All storage piles:

- One - 0.8 acre feed stock pile; and
- Two - 0.4 acre final product piles.

- 2.b The permittee shall employ best available control measures on 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 maintain sufficient moisture content of the material 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 measure(s) 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 measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) 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 maintain sufficient moisture content of the material to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2. Additional Terms and Conditions (continued)**

- 2.e The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.f 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 3745-31-05.
- 2.g 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.

**B. Operational Restrictions**

None

**C. Monitoring and/or Record Keeping 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:  

storage pile identification	minimum load-in inspection frequency
All	Weekly
- 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:  

storage pile identification	minimum load-out inspection frequency
All	Weekly
- 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:  

storage pile identification	minimum wind erosion inspection frequency
All	Weekly
- 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.

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

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 section C.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.

**D. Reporting Requirements**

1. The permittee shall submit deviation 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 limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

**1.a Emission Limitation:**

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

Applicable Compliance Method:

Compliance with the emission 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".

**E. Testing Requirements (continued)**

**1.b Emission Limitation:**

PE shall not exceed 2.43 TPY.

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) and USEPA's Control of Open Fugitive Dust Sources, Eq. 4-9 (9/88).

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

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); and  
M = material moisture content (%).

$$\text{Feedstock} = (0.74) (0.0032) [(10/5)^{1.3} / (25/2)^{1.4}] (2 \text{ transfers}) (2,190,000 \text{ TPY}) (0.0005 \text{ ton/lb}) = 0.37 \text{ TPY uncontrolled}$$

$$\text{Product} = (0.74) (0.0032) [(10/5)^{1.3} / (15/2)^{1.4}] (3 \text{ transfers}) (1,270,200 \text{ TPY}) (0.0005 \text{ ton/lb}) = 0.66 \text{ TPY uncontrolled}$$

$$\text{Wind Erosion associated with storage piles: } EF = 1.7 (s/1.5) (f/15) [(365 - p)/235]$$

where:

EF = lb/day/acre;  
s = silt content;  
f = % of time wind speed exceeds 12 mph;  
p = Number of days per year with > 0.1 inch precipitation; and  
A = total surface area of piles (acres).

$$\text{Feedstock} = 1.7 (3/1.5) (30/15) [(365-145)/235] (365 \text{ d/yr}) (0.8 \text{ acre}) (0.0005 \text{ ton/lb}) = 0.93 \text{ TPY unc.}$$

$$\text{Final Product} = 1.7 (15/1.5) (30/15) [(365-145)/235] (365 \text{ d/yr}) (0.8 \text{ acre}) (0.0005 \text{ ton/lb}) = 4.65 \text{ TPY unc.}$$

Material Transfer Control efficiency = 0% since material moisture content is factored in EF.

Wind Erosion Control efficiency for water = 75%

$$\text{Total controlled emissions} = \text{Material Transfer unc.}(1\text{-\% control}) + \text{Wind Erosion unc.}(1\text{-\% control}) = (1.03 \text{ TPY}) (1 - 0.0) + (5.58 \text{ TPY}) (1 - 0.75) = 2.43 \text{ tons PE/yr}$$

**F. Miscellaneous Requirements**

None