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State of Ohio Environmental Protection Agency

Street Address:

1800 WaterMark Drive  
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

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

03/17/98

CERTIFIED MAIL

06-79-00-0277

RE: Final Chapter 3745-35 Permit To Operate

Belden & Blake Corp.-Mineral City Railcar  
Todd C. Miller  
2500 Stoneham Road  
North Canton, OH 44720

Dear Todd C. Miller:

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 Pollution Prevention at (614) 644-3469.

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. 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

If you have any questions, please contact the Southeast District Office at (614) 385-8501.

Very truly yours,

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

cc: Southeast District Office



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 03/17/98

Facility ID: 06-79-00-0277

Expiration Date: 03/17/03

FINAL ISSUE

This document constitutes issuance for:

Belden & Blake Corp.-Mineral City Railcar  
9376 State Route 800 North  
Mineral City, OH 44656

of a permit to operate for:

J001 (Railcar Loading)  
Railcar Loading Facility

### PART I General Terms & 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 three 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 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 appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

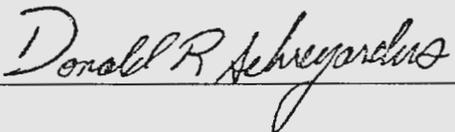
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(614) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

**10. The permittee is also subject to the attached special terms and conditions.**

OHIO ENVIRONMENTAL PROTECTION AGENCY

  
\_\_\_\_\_  
Director

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

- 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Railcar Loading Facility for crude oil	OAC rule 3745-31-05 See F.1.	Emissions of volatile organic compounds (VOC's) shall not exceed 95.6 tons per year.

**2. Additional Terms and Conditions**

None

**B. Operational Restrictions**

- This facility shall not load more than 12 railcars per day. Twelve (12) railcars represents the maximum number of railcars which could be loaded at this facility per day.

**C. Monitoring and/or Record Keeping Requirements**

- Belden & Blake shall maintain records on site of the number of railcars loaded per day.
- If Belden & Blake obtains new emission factors which shows an increase or a decrease in emissions for the crude oil loaded, the revised emission factors and proposed revised emission limitations shall be submitted to the Ohio EPA, Southeast District Office within 30 days after this information becomes available.

**D. Reporting Requirements (continued)**

- Belden & Blake shall submit deviation (excursion) reports for any day that the number of railcars loaded exceeds 12. The notification shall be sent to the Ohio EPA, Southeast District Office within 45 days after the exceedance occurs.

**E. Testing Requirements**

- Compliance with the emission limit of 95.6 tons per year shall be demonstrated as follows:

$$(1.71 \text{ lbs VOC}/1000 \text{ gallons crude oil loaded}) \times (25,536 \text{ gallons crude oil}/\text{railcar}) \times (12 \text{ railcars}/\text{day}) \times (365 \text{ days}/\text{year}) \times (\text{ton}/2000 \text{ lbs}) = 95.6 \text{ tons VOC}/\text{year}.$$

The emission factor of 1.71 pounds per 1000 gallons loaded was calculated from AP-42, 5th edition, section 5.2 and the TANKS3 program.

**F. Miscellaneous Requirements**

- The following terms and conditions shall supersede all the air pollution control requirements contained in permit to install number 06 - 4966 issued for this emissions unit on February 5, 1997: A.1; C.1; D.1.