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State of Ohio Environmental Protection Agency

OHIO ENVIRONMENTAL  
PROTECTION AGENCY  
SOUTHEAST DISTRICT Mailing Address:

Street Address:

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

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

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

02/02/06

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate Modification**

**P001 (Coal Preparation Plant with Thermal Coal Dryer) Coal  
Preparation Plant with Thermal Coal Dryer**

Central Fuel Company (06-79-02-0004)  
Keith B. Kimble  
PO Box 165  
New Philadelphia, OH 44663

Dear Keith B. Kimble:

The enclosed modified 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. 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 the Southeast District Office at (740) 385-8501.

Sincerely,

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

cc: Southeast District Office



State of Ohio Environmental Protection Agency

## Final Modification Permit To Operate An Emissions Unit

Effective Date: 02/02/06

Expiration Date: 02/02/11

Modification Effective Date: 02/02/06

This document constitutes issuance to:

Facility ID: 06-79-02-0004  
Central Fuel Company  
2458 Shadyview Road  
New Philadelphia, OH 44663

of a permit to operate for:

P001 (Coal Preparation Plant with Thermal Coal Dryer)  
Coal Preparation Plant with Thermal Coal Dryer

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

A handwritten signature in black ink, appearing to read "Joseph P. Koncelik".

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 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>  |
|---|---------------------------------------|---|
| Coal preparation plant with a natural gas (startup) and coal fine-fired thermal coal dryer, controlled by a cyclone and a mist eliminator | OAC rule 3745-35-07                   | Particulate emissions shall not exceed 411 pounds per day nor 75.2 tons per year.   |
|   | OAC rule 3745-17-11                   | Emissions of sulfur dioxide shall not exceed 181 pounds per day nor 33.1 tons per year.<br>Particulate emissions shall not exceed 47.1 pounds per hour from the stack. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07. |
|   | OAC rule 3745-18-06                   | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07.  |
|   | OAC rule 3745-17-07                   | Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.                   |

**2. Additional Terms and Conditions**

- 2.a The permittee shall take reasonable precautions, at all times, to prevent particulate matter from becoming airborne. Such precautions shall include:
  - i. The application of water or other suitable dust suppressants on roads and driveways in the facility.
  - ii. Maintaining the present dust suppression system on all coal conveyor transfer points within the building so as to minimize the emission of fugitive dust from the building.
  - iii. Promptly patching any leaks which occur in the building or storage silos.
  - iv. Adopting a policy by the company whereby coal will not be unloaded from or loaded into trucks which are consistently being used without truck coverings over exposed loads.

## **B. Operational Restrictions**

1. The air pressure at the inlet to the mist eliminator shall be continuously maintained between 10 and 15 inches of water at all times while the emissions unit is in operation, except during calibration and maintenance activities, as noted on the recorder chart.
2. The water pressure in the line supplying water to the mist eliminator shall be continuously maintained between 20 and 30 pounds per square inch at all times while the emissions unit is in operation, except during calibration and maintenance activities, as noted on the recorder chart.

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

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the air pressure at the inlet to the mist eliminator and the water pressure in the line supplying water to the mist eliminator while the emissions unit is in operation. These monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturers' recommendations, instructions and operating manuals.
2. The permittee shall maintain daily records of the following information:
  - a. the hours of operation;
  - b. the calculated particulate emission rate, in pounds per day, i.e., [the emission rate from the latest emission test, in pounds per hour] x [the hours of operation for the day]; and
  - c. the calculated sulfur dioxide emission rate, in pounds per day, i.e., [the emission rate from the latest emission test, in pounds per hour] x [the hours of operation for the day].
3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

## **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation reports that identify all periods of time during which the air pressure at the inlet to the mist eliminator and/or the water pressure in the line supplying water to the mist eliminator were not maintained within the ranges specified in Sections B.1 and B.2 of this permit. These reports shall be submitted to the Ohio EPA, SEDO by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
2. The permittee shall submit quarterly deviation reports that identify each day that exceeded the daily emission limitation[s] for particulates and/or sulfur dioxide. These reports shall be submitted to the Ohio EPA, SEDO by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, SEDO by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit annual reports that specify the actual emissions of particulates and sulfur dioxide from this emissions unit. Each report shall be submitted to the Ohio EPA, SEDO by January 31 of each year and shall cover the previous calendar year.

## **E. Testing Requirements**

1. Compliance with the 411 pounds of particulate emissions per day limitation shall be determined by multiplying the particulate emission rate documented by the most recent stack test, in pounds per hour, by the daily operating hours.

**E. Testing Requirements (continued)**

2. Compliance with the 181 pounds of sulfur dioxide per day limitation shall be determined by multiplying the sulfur dioxide emission rate documented by the most recent stack test, in pounds per hour, by the daily operating hours.
3. Compliance with the annual particulate and sulfur dioxide emission limitations shall be determined by multiplying the particulate and sulfur dioxide emission rates documented by the most recent stack test[s], in pounds per hour, by the annual operating hours, and then dividing by 2000.
4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months of permit issuance.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates and sulfur dioxide.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1 through 5 of 40 CFR Part 60, Appendix A for particulates; and Methods 1 through 4, and 6 of 40 CFR Part 60, Appendix A for sulfur dioxide. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, SEDO.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, SEDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, SEDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, SEDO shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, SEDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, SEDO.

5. If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9, and OAC rule 3745-17-03(B)(1).

**F. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-35-07(B)(2), all the terms and conditions of this permit to operate are federally enforceable. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.
2. Potential to emit (PTE) calculations, using conservative estimates, have been performed for PM10 emissions from all other operations at this facility. Specifically, these include: haul roads and other flat areas not normally subject to traffic, material transfer and conveying operations, coal storage piles, and crushing and screening operations. The total PTE has been determined to be 23.6 tons per year for these emissions units.

