

Facility ID: 1431072121 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431072121 Emissions Unit ID: F016 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

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>
barge loading of various materials (middle dock)	OAC rule 3745-31-05 (PTI 14-4705)	21.6 lbs/hr of particulate matter (PM); 7.9 lbs/hr of particulate matter less than 10 microns in diameter (PM10); See Term A.2.e. 3.6 tons per year (tpy) of PM; 1.3 tpy of PM10
	40 CFR, Part 60, Subpart Y OAC rule 3745-17-07(B)(1)	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See Section A.2.) less stringent than OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity, as a three-minute average, except as provided by rule. less stringent than the control measures established under OAC rule 3745-31-05

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05 shall consist of the use of wet suppression, covered conveyors, a telescoping spout, and throughput limitations. Wet suppressant shall be applied to each point in the loading operation as needed to eliminate visible emissions during the barge loading process. Spray points shall be those indicated on the attached diagram (Attachment 1 from PTI 14-4705). All conveyors associated with this emissions unit shall be covered. All drop heights shall be minimized. The hourly PM and PM10 emission limitations outlined above are based upon the emissions unit's maximum rated capacity and control requirements outlined in this section, and represent the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. Emissions unit F016 shall not be operated in excess of its maximum rated capacity (600 tons/hr).
2. The maximum annual production rate for this emissions unit shall not exceed 200,000 tons per year, based upon a rolling, 12-month summation of the production rates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform inspections on this emissions unit on at least an hourly basis, to determine if visible emissions are being emitted from the barge loading operation.

The permittee may, upon receipt of approval from Hamilton County Department of Environmental Services (HCDES), modify the above-mentioned frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the visible emissions requirements.
2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee shall maintain the following records for this emissions unit:

- a. hourly records that verify that the barge loading operation occurring at that time was checked for visible emissions; and
 - b. daily records that document the times that wet suppressant was applied at each of the transfer points associated with this emissions unit.
4. The permittee shall maintain the following monthly records for this emissions unit:
- a. the amount of material loaded, in tons;
 - b. the rolling, 12-month summation of the amount of material loaded (this information shall include the current month and the preceding eleven calendar months).

D. Reporting Requirements

1. At least 14 days prior to loading any material other than coal, the permittee shall provide written notification to HCDES. Such notification shall include information, in an acceptable form, sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits in Section A.1 and the control requirements in Section A.2.
2. The permittee shall immediately notify HCDES if the control measure requirements for this emissions unit, as outlined in Section A.2, are not met. A report explaining the cause of and extent of the violation shall be submitted within thirty (30) days of the occurrence.
3. Deviation reports shall be submitted to HCDES, during the first 12 calendar months of operation following the issuance of PTI 14-4705, for all exceedances of the maximum allowable cumulative production levels. Thereafter, the permittee shall submit deviation reports that identify all exceedances of the rolling, 12-month summation production rate limitation. These reports shall include the updated rolling, 12-month production rate for each month.

E. Testing Requirements

1. Compliance with the emission limits in Section A.1 and the annual operating restrictions in Section B of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:
21.6 lbs of PM/hr

Applicable Compliance Method:

The worst case hourly PM emissions result from processing coal and shall be calculated by the following method:

$$E = (\text{maximum rated capacity of the emissions unit, in tons per hour}) \times (F1 + F2) \times (1 - CEw) \times (1 - CEc)$$

where:

E = PM emission rate (lbs/hr)

max. rated capacity = 600 tons/hr

F1 = emission factor for loading of coal, which is the ratio of the pounds of PM emitted to the amount of coal loaded, 0.2 lb of PM/ton of coal (from RACM, Table 2.19-2)

F2 = emission factor for conveying coal, which is the ratio of the pounds of PM emitted to the amount of coal conveyed, 0.4 lb of PM/ton of coal (from RACM, Table 2.19-2)

CEw = estimated control efficiency provided by water suppressant as outlined in Section A.2, 0.80 (from RACM)

CEc = estimated control efficiency provided by covered conveyors and telescoping chute as outlined in Section A.2 of this permit, 0.70 (from RACM)

Emission Limitation:

7.9 lbs/hr of PM10

Applicable Compliance Method:

The worst case PM10 emissions shall be calculated by multiplying the total hourly PM emissions by the decimal fraction of particulate matter that is less than or equal to 10 microns in diameter, or 0.366.

Emission Limitation:

3.6 tpy of PM

Applicable Compliance Method:

The worst case yearly PM emissions result from the maximum allowable annual throughput of coal and shall be calculated by the following method:

$$E = (\text{maximum annual throughput, in tons per year}) \times (F1 + F2) \times (1 - CEw) \times (1 - CEc) / 2,000 \text{ lbs per ton.}$$

where:

E = PM emission rate (tpy)

max. amount of coal throughput = 200,000 tons of coal/year

F1 = emission factor for loading coal, 0.2 lb of PM/ton of coal (from RACM, Table 2.19-2)

F2 = emission factor for conveying coal, 0.4 lb of PM/ton of coal (from RACM, Table 2.19-2)

CEw = estimated control efficiency for water suppressant, 0.80

CEc = estimated control efficiency for covered conveyors and telescoping chute, 0.70

Emission Limitation:

1.3 tpy of PM10

Applicable Compliance Method:

The worst case yearly PM10 emissions shall be calculated by multiplying the total yearly PM emissions by the decimal fraction of particulate matter that is less than or equal to 10 microns in diameter, or 0.366.

Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a three-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(3).

Production Limitation:

The maximum annual production rate for this emissions unit shall not exceed 200,000 tons per year, based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method:

Compliance with the above limitation shall be determined using the records maintained pursuant to Section C.4 of this permit.

F. **Miscellaneous Requirements**

1. If probable cause exists indicating that this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.