

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: F017 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>
railcar loading of coal, iron ore, similar materials	OAC rule 3745-31-05(A)(3) PTI 14-4882	40.0 lbs of particulate emissions (PE)/hour* 14.6 lbs of particulate matter emissions with a diameter of 10 microns or less (PM10)/hour*
		28.0 tons per year (TPY) of PE 10.2 TPY of PM10 emissions
		* The hourly emission limitations specified above are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits. See Section A.2.a below.
	40 CFR, Part 60, Subpart Y OAC rule 3745-17-07(B)(1)	The visible PE limitation specified by this rule is less stringent than that established pursuant to 40 CFR, Part 60, Subpart Y.
	OAC rule 3745-17-08(B)	Reasonably available control measures consisting of the use of wet suppression and minimal drop heights to minimize or eliminate visible PE of fugitive dust.

**2. Additional Terms and Conditions**

- (a) The owner or operator shall not cause to be discharged into the atmosphere from any coal processing, conveying, transferring, or loading equipment, gases which exhibit 20 percent opacity or greater, as a six-minute average.  
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.

**B. Operational Restrictions**

1. The maximum annual loading rate of all materials for this emissions unit shall not exceed 700,000 tons/year.

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

1. The permittee shall maintain monthly records of the type and amount, in tons, of each material loaded in this emissions unit.
2. The permittee shall maintain annual records of the total amount, in tons, of all materials loaded in this emissions unit (summation of C.1 for all materials loaded for each month of the calendar year).

**D. Reporting Requirements**

1. The permittee shall submit annual reports that specify the total amount, in tons, of all materials loaded in this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

**E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for emissions unit F017 in accordance with the

following requirements:

- a. The emission testing shall be conducted no later than 60 days after beginning to load coal into railcars.
  - b. The emission testing shall be conducted to demonstrate compliance with the visible PE limitation.
  - c. The following test method shall be employed to demonstrate compliance with the visible PE limitation: Method 9 of 40 CFR, Part 60, Appendix A.
  - 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 Hamilton County Department of Environmental Services.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services' refusal to accept the results of the emission test(s).
  3. Personnel from the Hamilton County Department of Environmental Services 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.
  4. 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.
  5. Compliance with the PE limitation, PM10 emission limitation, visible PE limitation and material loading rate restriction specified in Sections A and B shall be determined by the following methods:  
PE Limitation: 40.0 lbs of PE/hour; 28.0 TPY of PE

Applicable Compliance Method: The hourly PE limitation represents the emissions unit's potential to emit and was calculated by considering the maximum amount of material to be loaded in one hour (500 tons/hour) multiplied by an emission factor of 0.40 lb of PE/ton of material loaded [from reasonable available control measures (RACM) document, Section 2.19, Table 2.19-2, for coal processing plants] and multiplied by [1 - the fractional control efficiency (0.80) of the control measure (from RACM document, Table 2.19-3, fugitive dust emissions from coal processing plants)].

Compliance with the annual PE limitation shall be determined by taking the amount of material loaded in one year (i.e., in tons/year) multiplied by an emission factor of 0.40 lb of PE/ton of material loaded [from reasonable available control measures (RACM) document, Section 2.19, Table 2.19-2, for coal processing plants] and multiplied by [1 - the fractional control efficiency (0.80) of the control measure (from RACM document, Table 2.19-3, fugitive dust emissions from coal processing plants) and divided by 2,000 lbs/ton].  
PM10 Emission Limitation: 14.6 lbs of PM10 emissions/hour; 10.2 TPY of PM10 emissions

Applicable Compliance Method: The hourly PM10 emission limitation represents the emissions unit's potential to emit and is a function of the amount of PE (36.6% of the PE, as specified in RACM Table 2.1.2-6).

The annual PM10 emissions are a function of the amount of PE and compliance with this emission limitation shall be determined by multiplying the annual amount of PE by 36.6% (i.e., 0.366).  
Emission Limitation: visible PE from this emissions unit shall not exceed 20% opacity

Applicable Compliance Method: Compliance with the visible PE limitation shall be determined in accordance with Test Method 9 of 40 CFR, Part 60, Appendix A.  
Material Loading Rate Restriction: not to exceed 700,000 TPY

Applicable Compliance Method: Compliance with the annual material loading rate restriction shall be determined by the record keeping requirements specified in Section C.2.

**F. Miscellaneous Requirements**

1. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance in violation of OAC rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this emissions unit into compliance.
2. At least 30 days prior to loading materials other than coal or raw iron products into railcars, this facility shall provide written notification to the Hamilton County Department of Environmental Services. 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 and/or control requirements as outlined in this permit.