



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

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

8/28/2008

Samuel Hatcher
Gatling Ohio LLC
PO Box 960
New Haven, WV 25265

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0653000073
Permit Number: 06-08389
Permit Type: Initial Installation
County: Meigs

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-SEDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
Gatling Ohio LLC**

Facility ID: 0653000073
Permit Number: 06-08389
Permit Type: Initial Installation
Issued: 8/28/2008
Effective: 8/28/2008
Expiration: 8/28/2018



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
 for
 Gatling Ohio LLC

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Final Permit-to-Install and Operate
Permit Number: 06-08389
Facility ID: 0653000073
Effective Date: 8/28/2008

Authorization

Facility ID: 0653000073
Application Number(s): A0006585
Permit Number: 06-08389
Permit Description: Permit to install coal crushing, screening, and wet plant, with associated belt conveyors, stockpiles and roadways.
Permit Type: Initial Installation
Permit Fee: \$2,700.00
Issue Date: 8/28/2008
Effective Date: 8/28/2008
Expiration Date: 8/28/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Gatling Ohio LLC
Yellow Bush Rd.
Racine, OH 45771

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: 06-08389
Permit Description: Permit to install coal crushing, screening, and wet plant, with associated belt conveyors, stockpiles and roadways.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	F001
Company Equipment ID:	Stockpile
Superseded Permit Number:	.
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	Roadways & Parking
Superseded Permit Number:	.
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	Screen, Crusher & Conveyor
Superseded Permit Number:	.
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: 06-08389

Facility ID: 0653000073

Effective Date: 8/28/2008

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?



If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: 06-08389

Facility ID: 0653000073

Effective Date: 8/28/2008

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

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Effective Date: 8/28/2008

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: 06-08389

Facility ID: 0653000073

Effective Date: 8/28/2008

1. 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).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

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Effective Date: 8/28/2008

C. Emissions Unit Terms and Conditions



1. F001, Stockpile

Operations, Property and/or Equipment Description:

Raw Storage Piles (with 17,520,000 tons/year throughput) and **Clean Coal Storage Piles** (with 11,388,000 tons/year throughput)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions shall not exceed 11.65 tons/year of fugitive particulate emissions (PE). No visible fugitive PE except for one minute during any 60-minute period. Best available control measures to minimize or eliminate visible PE of fugitive dusts. See b)(2).a through b)(2).g. below.
b.	OAC rule 3745-17-07(B)(6)	See b)(2).h. below.
c.	OAC rule 3745-17-08(B)	See b)(2).i. below

(2) Additional Terms and Conditions

a. The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

Raw Coal Pile (OS-1)



Clean Coal Pile (OS-2).

- b. The load-in and load-out operations covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

Load-in to raw coal piles (TP-2) from conveyor (BC-1)

Load-out of raw coal pile (TP-3) through underground conveyor (BC-2)

Load-in of clean coal pile (TP-14) from conveyor (BC-6)

Load-out of clean coal pile (TP-15) through underground conveyor (BC-8)

- c. 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 application, the permittee has committed to control fugitive emissions by maintaining partial enclosures on load-in operations and full enclosures on load-out operations. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- d. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile at all times. Inspections shall be conducted pursuant to the monitoring section of this permit 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.
- e. 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 application, the permittee has committed to watering storage piles to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- f. 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.
- g. 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(A)(3).
- h. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.



- i. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping 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:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
ALL	DAILY

- (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:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
ALL	DAILY

- (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:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
ALL	DAILY

- (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.

- (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 d)(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.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1). of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

Emissions shall not exceed 11.65 tons/year of fugitive particulate emissions (PE).

Applicable Compliance Method:

For Raw Coal Pile:

Compliance shall be determined based on the emission factor calculation for drop operations associated with storage piles in AP-42 section 13.2.4 (11/06).

Initial compliance has been determined using inputs representing current conditions as follows:

$$EF = k (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

Where:

EF = emission factor expressed in pounds per ton (lbs/ton)



k = particle size multiplier for TSP (dimensionless) = 0.74

U = mean wind speed expressed in miles per hour (MPH) = 7

M= material moisture content (%) = 4

Therefore, EF = 0.0014 lbs/ton

maximum annual load-in throughput =17,520,000 tons/year

$[(17,520,000 \text{ tons/year}) (0.0014 \text{ lb PE/ton})] / 2000\text{lb/ton}$

=12.26 TPY of uncontrolled PE from load-in

Assume 50% control for partial enclosure (WVDEP Guidance Document- G10-C)

$(12.26 \text{ TPY}) (0.50) = 6.13 \text{ TPY of controlled PE}$

maximum annual load-out throughput = 17,520,000 tons/year

$[(17,520,000 \text{ tons/year}) (0.0014 \text{ lb PE/ton})] / 2000\text{lb/ton}$

=12.26 TPY of uncontrolled PE from load-out

Assume 80% control for full enclosure (WVDEP Guidance Document- G10-C)

$(12.26 \text{ TPY}) (0.20) = 2.45 \text{ TPY of controlled PE}$

Compliance shall also be determined based on the emission factor calculation for wind erosion from storage piles found in USEPA's Control of Open Fugitive Dust Sources (9/88). Initial compliance has been determined using inputs representing current conditions as follows:

$$EF = (1.7) (s/1.5) ((365-p)/235) (f/15)$$

Where:

E= emission factor in pounds (lbs)/day/acre

s = silt content of road surface material (%) = 5%

p= number of rain days per year >0.01 in. = 157

f = percentage of time that wind speed exceeds 12 mph (%) = 20

A= total surface area of storage piles (acres) = 1.45

Therefore, EF= 6.69 lbs/day/acre

$$[(6.69 \text{ lbs/day/acre})(365 \text{ days/yr})(1.45 \text{ acres})] / 2000\text{lbs/ton} = 1.77 \text{ TPY uncontrolled PE}$$

Assume 75% control for watering stockpile (engineering estimate of permittee)



$$(1.77 \text{ TPY}) (0.25) = 0.44$$

For Clean Coal Pile:

Compliance shall be determined based on the emission factor calculation for drop operations associated with storage piles in AP-42 section 13.2.4 (11/06).

Initial compliance has been determined using inputs representing current conditions as follows:

$$EF = k (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

Where:

EF = emission factor expressed in pounds per ton (lbs/ton)

k = particle size multiplier for TSP (dimensionless) = 0.74

U = mean wind speed expressed in miles per hour (MPH) = 7

M = material moisture content (%) = 7

Therefore, EF = 0.0006 lbs/ton

maximum annual load-in throughput = 11,388,000 tons/year

$$[(11,388,000 \text{ tons/year}) (0.0006 \text{ lb PE/ton})] / 2000 \text{ lb/ton}$$

= 3.42 TPY of uncontrolled PE from load-in

Assume 50% control for partial enclosure (WVDEP Guidance Document- G10-C)

$$(3.42 \text{ TPY}) (0.50) = 1.71 \text{ TPY of controlled PE}$$

maximum annual load-out throughput = 11,388,000 tons/year

$$[(11,388,000 \text{ tons/year}) (0.0006 \text{ lb PE/ton})] / 2000 \text{ lb/ton}$$

= 3.42 TPY of uncontrolled PE from load-out

Assume 80% control for full enclosure (WVDEP Guidance Document- G10-C)

$$(3.42 \text{ TPY}) (0.20) = 0.68 \text{ TPY of controlled PE}$$

Compliance shall also be determined based on the emission factor calculation for wind erosion from storage piles found in USEPA's Control of Open Fugitive Dust Sources (9/88). Initial compliance has been determined using inputs representing current conditions as follows:

$$EF = (1.7) (s/1.5) ((365-p)/235) (f/15)$$

Where:

E = emission factor in pounds (lbs)/day/acre



s = silt content of road surface material (%) = 5%

p= number of rain days per year >0.01 in. = 157

f = percentage of time that wind speed exceeds 12 mph (%) = 20

A= total surface area of storage piles (acres) =0.79

Therefore, EF= 6.69 lbs/day/acre

$[(6.69 \text{ lbs/day/acre})(365 \text{ days/yr})(0.79 \text{ acres})]/2000 \text{ lbs/ton} = 0.96 \text{ TPY}$
uncontrolled PE

Assume 75 % control for watering storage piles (engineering estimate of permittee)

$(0.96 \text{ TPY})(0.25) = 0.24 \text{ TPY}$ controlled PE

TOTAL EMISSION SUMMARY

Load-in raw coal pile= 6.13 TPY

Load-out raw coal pile= 2.45 TPY

Wind erosion from raw coal pile= 0.44 TPY

Load-in clean coal pile= 1.71 TPY

Load-out clean coal pile= 0.68 TPY

Wind erosion clean coal pile = 0.24 TPY

Total emissions = 11.65 TPY

b. Emission Limitation:

No visible PE except for one minute during any 60-minute period.

Compliance Method:

If required, visible emissions of fugitive dust shall be determined according to USEPA Method 22, with the modifications found in OAC rule 3745-17-03(B)(4).

g) Miscellaneous Requirements

(1) None.



2. F002, Roadways & Parking

Operations, Property and/or Equipment Description:

Unpaved Parking Areas and Access and Maintenance Roads (Maximum of 47,045 VMT/year)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(E) (Voluntary Restriction to Avoid BAT)	Emissions shall not exceed 9.9 tons/year of fugitive particulate emissions (PE). See b)(2)a.
b.	OAC rule 3745-17-07(B)(5)	See b)(2)b. below.
c.	OAC rule 3745-17-08(B)	See b)(2)c. below

(2) Additional Terms and Conditions

a. Permit to Install 06-08389 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. the permittee will apply water to the roadways listed in d)(1).as needed and maintain road surfaces in order to achieve 70 % control efficiency of fugitive dusts generated from this emissions source.



- b. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
- c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

unpaved roadways and parking areas	minimum inspection frequency
Yellowbush Access Road	Daily
Yellowbush Parking Lot	Daily
Meigs Loadout Access	Daily
Meigs Maintenance Road	Daily
Yellowbush Substation Road	Daily
Yellowbush Conveyor Maintenance Road	Daily
Yellowbush Shaft Access Road	Daily
Return Shaft Access Road	Daily
Meigs Conveyor Access Road	Daily.

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area 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. 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.

- (3) 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 the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
- e. The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

Emissions shall not exceed 9.9 tons/year of fugitive particulate emissions (PE).

Applicable Compliance Method:

Compliance shall be determined based on the emission factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.2, (11/06). Initial compliance has been determined utilizing inputs representing current conditions as follows:

$$EF = [k(s/12)^a(W/3)^b[(365-p)/365]]$$

For the Yellowbush Access Road, Yellowbush Parking Lot, Meigs Loadout Access, and Meigs Maintenance Road:

Where:

- EF = size-specific emission factor (lb/VMT)
- s = silt content of road surface material (%) = 5.1 %
- W = mean vehicle weight (tons) = 1
- a = constant (dimensionless) = 0.7
- b = constant (dimensionless) = 0.45
- k = particle size multiplier (dimensionless) = 4.9
- p = number of rain days per year >0.01 in. = 157
- Therefore, EF = 0.94 lb/VMT

Yellowbush Access Road
Maximum travel = 18,240 VMT/year
(18, 240 VMT/year)(0.94 lb/VMT)(1 ton/2000 lbs) = 8.57 TPY uncontrolled PE



Yellowbush Parking Lot Access
 Maximum travel = 18,240 VMT/year
 $(18,240 \text{ VMT/year})(0.94 \text{ lb/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 8.57 \text{ TPY uncontrolled PE}$

Meigs Loadout Road
 Maximum travel = 4,380 VMT/year
 $(4,380 \text{ VMT/year})(0.94 \text{ lb/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 2.06 \text{ TPY uncontrolled PE}$

Meigs Maintenance Road
 Maximum travel = 730 VMT/year
 $(730 \text{ VMT/year})(0.94 \text{ lb/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 0.34 \text{ TPY uncontrolled PE}$

For Yellowbush Substation Road, Yellowbush Conveyor Maintenance Road, Yellowbush Shaft Access Road, Return Shaft Access Road, and Meigs Conveyor Access Road:

Where:

- EF = size-specific emission factor (lb/VMT)
 - s = silt content of road surface material (%) = 5.1 %
 - W = mean vehicle weight (tons) = 5
 - a = constant (dimensionless) = 0.7
 - b = constant (dimensionless) = 0.45
 - k = particle size multiplier (dimensionless) = 4.9
 - p = number of rain days per year >0.01 in. = 157
- Therefore, EF = 1.93 lb/VMT

Yellowbush Substation Road:
 Maximum travel = 730 VMT/year
 $(730 \text{ VMT/year})(1.93 \text{ lb/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 0.70 \text{ TPY uncontrolled PE}$

Yellowbush Conveyor Maintenance Road:
 Maximum travel = 730 VMT/year
 $(730 \text{ VMT/year})(1.93 \text{ lb/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 0.70 \text{ TPY uncontrolled PE}$

Yellowbush Shaft Access Road:
 Maximum travel = 730 VMT/year
 $(730 \text{ VMT/year})(1.93 \text{ lb/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 0.70 \text{ TPY uncontrolled PE}$

Return Shaft Access Road:
 Maximum travel = 730 VMT/year
 $(730 \text{ VMT/year})(1.93 \text{ lb/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 0.70 \text{ TPY uncontrolled PE}$



Meigs Conveyor Access Road:
Maximum travel = 1,095 VMT/year
(1,095 VMT/year)(1.93 lb/VMT)(1 ton/2000 lbs) = 1.06 TPY uncontrolled PE

For Yellowbush Access Road (Delivery Trucks):

Where:

EF = size-specific emission factor (lb/VMT)
s = silt content of road surface material (%) = 5.1 %
W = mean vehicle weight (tons) = 10
a = constant (dimensionless) = 0.7
b = constant (dimensionless) = 0.45
k = particle size multiplier (dimensionless) =4.9
p = number of rain days per year >0.01 in. = 157
Therefore, EF =1.93 lb/VMT
Maximum travel = 1,440 VMT/year
(1,440 VMT/year)(2.64 lb/VMT)(1 ton/2000 lbs) = 1.90 TPY uncontrolled PE

Total roadway and parking lot particulate emissions:

8.57 TPY+ 8.57 TPY+ 2.06 TPY+ 0.34 TPY+ 0.70 TPY+0.70 TPY+ 0.70 TPY+
0.70 TPY+ 1.06 TPY+ 1.90 TPY=

25.3 TPY uncontrolled particulate emissions (PE)

Assume 70% control efficiency for roadway watering (engineering estimate of permittee)

(25.3 TPY) (0.30) =7.59 TPY controlled PE

g) Miscellaneous Requirements

(1) None.



3. F003, Screen, Crusher & Conveyor

Operations, Property and/or Equipment Description:

2,000 TPH Coal crushing, screening, cleaning, storage systems and material handling (including conveying, barge loading, and load-in and load-out from silo).

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Total fugitive particulate emissions (PE) shall not exceed 58.41 tons/yr. No visible fugitive PE except for one minute during any 60-minute period. Best available control measures to minimize or eliminate visible PE of fugitive dusts.
b.	40 CFR Part 60, Subpart Y (In accordance with 40 CFR 30.250, this emissions unit contains affected facilities in a coal preparation plant which processes more than 200 tons of coal per day.)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)(5)	See b)(2)e. below.
d.	OAC rule 3745-17-08(B)	See b)(2)f below



(2) Additional Terms and Conditions

- a. The coal processing plant operations that are covered by this permit and subject to the requirements of OAC rules 3745-31-05 are listed below:

Material Handling/Transfer Points

TP1 – Belt conveyor from Mine shaft to Conveyor (BC-1) (2,000 TPH)
TP4 - Conveyor (BC-2) to Screener (SC-1) (2,000TPH)
TP5 - Screener (SC-1) to Crusher (CR-1) (2,000TPH)
TP6 - Crusher (CR-1) to conveyor (BC-3)(1,300 TPH)
TP7- Screener (SC-1) to conveyor (BC-3)(1,300 TPH)
TP8- Conveyor (BC-3) to Wet Wash Plant (1,300 TPH)
TP9 - Wet Wash Plant to conveyor (BC-5)(1,300 TPH)
TP10 - Crusher (CR-1) to conveyor (BC-4)(1,300 TPH)
TP11 - Conveyor (BC-4) to conveyor (BC-5)(1,300 TPH)
TP12 - Conveyor (BC-5) to conveyor (BC-7)(1,300 TPH)
TP13 - Wet Wash Plant to conveyor (BC-6)(1,300 TPH)
TP16 – Conveyor (BC-7) to embankment (1,300 TPH)
TP17 - Conveyor (BC-8) to conveyor(BC-9)(1,625 TPH)
TP18 - Conveyor (BC-9) to conveyor (BC-10)(1,625 TPH)
TP19 - Conveyor (BC-10) to 1,000 ton silo (BS-1)(1,625 TPH)
TP20 - 1,000 ton silo (BS-1) to conveyor (BC-11)(1,625 TPH)
TP21 - Conveyor (BC-11) to barge (1,625 TPH)

Equipment

Double Deck Screener (2,000TPH)
Double Roll Crusher (2,000TPH)
1,000 ton Storage Silo
(2) - 60" conveyor belts (BC-1 and BC-2) (2,000 TPH)
(5) - 48" conveyor belts (BC-3, 4, 5, 6, and 7) (1,300 TPH)
(4) - 48" conveyor belts (BC-8, 9, 10, and 11) (1,625 TPH)

- b. The permittee shall employ best available control measures for the coal processing plant operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee shall perform the following control measures to ensure compliance: maintain full and partial enclosures on applicable transfer points and on the crusher, utilize water sprays on the screener, and employ a telescopic chute for barge loading. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. For each coal processing plant operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required



implementation of the control measures shall continue during the operation of the coal processing plant operations until further observation confirms that use of the control measures is unnecessary.

- d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- e. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
- f. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart Y (40 CFR60.250-254).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform inspections for coal processing plant operations in accordance with the following minimum frequencies:

<u>coal processing plant operations</u>	<u>minimum inspection frequency</u>
All	Daily

- (2) The above-mentioned inspections shall be performed during representative, normal operating conditions.
- (3) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in d)(3)d. shall be kept separately for the coal processing plant operations identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- (4) See 40 CFR Part 63, Subpart Y (40 CFR60.250-254).



e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. construction date (no later than 30 days after such date);
 - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. actual start-up date (within 15 days after such date); and
 - d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
50 West Town Street, Suite 700
P. O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA Southeast District Office
Division of Air Pollution Control
2195 Front Street
Logan, Ohio 43138.

- (3) See 40 CFR Part 63, Subpart Y (40 CFR60.250-254).

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1). of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission limitation:

Total fugitive particulate emissions (PE) shall not exceed 58.41 tons/yr.

Applicable Compliance Method:

Transfer Points :

Compliance shall be determined based on the emission factor calculation for drop operations associated with storage piles in AP-42 section 13.2.4 (01/06).



For the following transfer points initial compliance has been determined using inputs representing current conditions as follows for transfer point prior to the wet wash plant:

$$EF = k (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

Where:

EF = emission factor expressed in pounds per ton (lbs/ton)

k = particle size multiplier for TSP (dimensionless) = 0.74

U = mean wind speed expressed in miles per hour (MPH) = 7

M= material moisture content (%) = 4

Therefore, EF = 0.0014 lbs/ton

[(transfer points) (maximum annual throughput) (0.0014 Lb PE/ton)]/ 2000lb/ton = uncontrolled PE

TP1:

[(1 transfer point)(17,520,000 tons/year) (0.0014 lb PE/ton)]/ 2000lb/ton =12.26 TPY of uncontrolled PE

Assume 50% control for partial enclosure (WVDEP Guidance Document-G-10-C)
(12.26 TPY)(0.50) = 6.13 TPY of controlled PE

TP4 and TP5:

[(2 transfer points)(17,520,000 tons/year) (0.0014 lb PE/ton)]/ 2000lb/ton =24.53 TPY of uncontrolled PE

Assume 80% control for full enclosure (WVDEP Guidance Document-G10-C)
(24.53 TPY) (0.20) = 4.91 TPY of controlled PE

TP6, TP7, and TP8:

[(3 transfer points)(11,388,000 tons/year) (0.0014 lb PE/ton)]/ 2000lb/ton =23.91 TPY of uncontrolled PE

Assume 80% control for full enclosure (WVDEP Guidance Document-G10-C)
(23.91 TPY) (0.20) = 4.78 TPY of controlled PE

TP10, TP11, and TP12:

[(3 transfer points)(11,388,000 tons/year) (0.0014 lb PE/ton)]/ 2000lb/ton = 23.91TPY of uncontrolled PE

Assume 50% control for partial enclosure (WVDEP Guidance Document-G10-C)
(23.91 TPY) (0.50) =11.96 TPY of controlled PE



TP16:

$$[(1 \text{ transfer point})(11,388,000 \text{ tons/year})(0.0014 \text{ lb PE/ton})]/2000 \text{ lb/ton} \\ = 7.97 \text{ TPY of uncontrolled PE}$$

$$\text{Assume 70\% control for moisture content (RACM Table 2.19-3)} \\ (7.97 \text{ TPY}) (0.30) = 2.39 \text{ TPY of controlled PE}$$

For the following transfer points initial compliance has been determined using inputs representing current conditions as follows for transfer points after the wet wash plant:

$$EF = k (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

Where:

- EF = emission factor expressed in pounds per ton (lbs/ton)
- k = particle size multiplier for TSP (dimensionless) = 0.74
- U = mean wind speed expressed in miles per hour (MPH) = 7
- M = material moisture content (%) = 7
- Therefore, EF = 0.0006 lbs/ton

$$[(\text{transfer points}) (\text{maximum annual throughput}) (0.0006 \text{ Lb PE/ton})] / 2000 \text{ lb/ton} = \\ \text{uncontrolled PE}$$

TP9 and TP13:

$$(2 \text{ transfer point})(11,388,000 \text{ tons/year}) (0.0006 \text{ lb PE/ton}) / 2000 \text{ lb/ton} \\ = 6.83 \text{ TPY of uncontrolled PE}$$

$$\text{Assume 80\% control for full enclosure (WVDEP Guidance Document-G10-C)} \\ (6.83 \text{ TPY}) (0.20) = 1.37 \text{ TPY of controlled PE}$$

TP17, TP18, and TP19:

$$[(3 \text{ transfer points})(14,235,000 \text{ tons/year}) (0.0006 \text{ lb PE/ton})] / 2000 \text{ lb/ton} \\ = 12.81 \text{ TPY of uncontrolled PE}$$

$$\text{Assume 50\% control for partial enclosure (WVDEP Guidance Document-G10-C)} \\ (12.81 \text{ TPY}) (0.50) = 6.41 \text{ TPY of controlled PE}$$

TP 20 and TP21:

$$[(2 \text{ transfer point})(14,235,000 \text{ tons/year}) (0.0006 \text{ lb PE/ton})] / 2000 \text{ lb/ton} \\ = 8.54 \text{ TPY of uncontrolled PE}$$



Assume 80% control for full enclosure (TP20)(WVDEP Guidance Document-G10-C) and for the telescopic chute (TP21)(WVDEP Guidance Document-G10-C)
= (8.54 TPY) (0.20) = 1.71 TPY of controlled PE

Crushing and Screening:

Compliance shall be determined based on the emission factors of 0.02 lb PE/ton for crushing(FIRE factor and RACM Chapter 2.19) and 0.0014 lb PE/ton for vibrating screener (AP-42 section 13.2.4 (01/06)).

[(1 crusher)(17,520,000 tons/year)(0.02 lb PE/ton) + (1 screener) (17,520,000 tons/year)(0.0014 lb PE/ton)]/ 2000 lb/ton = 187.46 tons of uncontrolled PE

Assume 90 % control for full enclosure and partial enclosure on the crusher (engineering estimate of permittee) and full enclosure and water sprays on the screener (engineering estimate of permittee).

= (187.46 TPY) (0.10) = 18.75 tons of controlled PE

Total controlled PE emissions = 58.41 tons/year

- (2) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit. Testing shall be completed in accordance with the requirements found in 40 CFR 60.250-254.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable visible PE limitation.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):
 - d. Compliance with the visible PE limitation specified by OAC rule 3745-31-05(A)(3) 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. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - f. 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 appropriate Ohio EPA District Office or local air agency.
 - g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

- h. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- i. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.