Facility ID: 0204010233 Issuance type: Draft State Permit To Operate

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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: 0204010233 Emissions Unit ID: F001 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Railcar rotary dumper, conveyors # 1, 2 and 3, and transfer points TP 1-2 and TP 2-3. See Section A.2.a.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.
	OAC rule 3745-17-08(B), (B)(2)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.b through A.I.2.d)

2. **Additional Terms and Conditions**

   (a) The material handling operations that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

   railcar rotary dumper
   conveyor belts #1, 2 and 3 including transfer points TP 1-2 and TP 2-3

   description:
   i. coal transfers from railcar to conveyor #1 via coal rotary dumper
   ii. coal transfers from conveyor #1 to conveyor #2 (bridge conveyor) via transfer point TP 1-2
   iii. coal transfers from conveyor #2 to conveyor #3 (main yard conveyor) via transfer point TP 2-3
   iv. coal transfers from conveyor #3 to stacker/reclaimer
   The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

   material handling operations:

   railcar rotary dumper

   control measures:

   application of sufficient water, as needed, to control dust emissions from building's opening(s); and

   maintain the 5-sided enclosure around railcar rotary dumper
   material handling operations:

   conveyors # 1 through 3, including transfer points TP 1-2 and TP 2-3

   control measures:

   application of sufficient water, as needed, to control dust emissions from all conveyor belts and transfer points; and

   maintain enclosures* around all conveyors and transfer points

   *conveyor belt #1 and 2 are partially enclosed, except for the a portion of conveyor #2 that spans across the Ashtabula River, it's fully enclosed.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
For each material handling operation that is not adequately enclosed, the above-identified control measure 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 measure is necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure is unnecessary.
Implementation of the above-mentioned control measure in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

B. **Operational Restrictions**

1. None

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

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of each of such operation in accordance with the following minimum frequencies:

   material handling operation(s) minimum inspection frequency

   railcar rotary dumper once/unloading day

   conveyor belts #1 through 3, including transfer points #1-2 and 2-3 once/unloading day

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;

   c. the dates the control measure was implemented; and

   d. on a calendar quarter basis, the total number of days the control measure was implemented.

   The information in section C.3.d shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. **Reporting Requirements**

1. The permittee shall submit deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency; and

   b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. **Testing Requirements**

1. Compliance with the emission limitation in section A.1 of these terms and conditions shall be determined in accordance with the following method:
   Emission Limitation:

   Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

   Applicable Compliance Method:

   If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions shall include any fugitive egress points from this emissions unit.

F. **Miscellaneous Requirements**

1. None