

Facility ID: 0204010233 Issuance type: Final 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: F002 Issuance type: Final State Permit To Operate

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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>
Coal storage piles (load-in and load-out of storage piles, and wind erosion)	OAC rule 3745-17-07(B)(6)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.a through A.2.1)
Stacker/reclaimer	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see section A.2.b)
Adjacent haul roads around storage piles	OAC rule 3745-17-07(B)(5)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B)(2)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.d through A.2.1)

2. Additional Terms and Conditions

- (a) During the unloading onto or removal from the aggregate storage piles, the drop height of the front-end loader shall be minimized in order to minimize or eliminate visible emissions of fugitive dust. A bucket wheel stacker reclaimer system shall be employed for load-in and load-out operations. The fixed water tower spray system, water tank truck(s) and/or other watering measures shall be operated so that, at a minimum, the number of gallons of water required for the tons of coal in storage each day is applied evenly and distributed over the coal storage piles and adjacent haul roads during each calendar day when watering is required, as shown on Table 1 for Summer (May 1 - September 15) or Table 2 for the Fall, Winter and Spring (September 16 - April 30). The permittee is required to water the coal storage piles each calendar day, except where one or more of the following conditions exists:
 - i. At any time during the year when:
 - (a) the ambient temperature is 32 degrees Fahrenheit or less at the facility at 9:00 AM;
 - (b) snow completely covers the coal piles at 9:00 AM; or
 - (c) if there has been 1.0 inch or more precipitation at the facility since 9:00 AM on the previous day, the permittee shall resume watering after two consecutive calendar days.
 - ii. During the Summer period (May 1 - September 15):
 - (a) if at 9:00 AM there has been 0.1 inch or more precipitation at the facility since 9:00 AM on the previous day; or
 - (b) if at 9:00 AM there has been precipitation which has been less than 0.1 inch during the 24 hours since 9:00 AM on the previous day, then the amount of water to be applied shall be diminished as shown in Table 1.

iii. During the Fall, Winter and Spring (September 16 to April 30):

- (a) if at 9:00 AM there has been 0.05 inch or more precipitation since 9:00 AM on the previous day;
or
- (b) if at 9:00 AM there has been precipitation which has been less than 0.05 inch during the 24 hours since 9:00 AM on the previous day, then the amount of water to be applied shall be diminished as shown in Table 2.

"Precipitation" shall be defined as rain or rain equivalent. Ten (10) inches of snow shall be equal to 1 inch of rain.

Spraying shall commence no later than 9:00 AM, unless precipitation is falling at 9:00 AM at the facility, in which event the precipitation will be checked again at 1:00 PM during the day shift, and spraying shall commence if precipitation is not falling at 1:00 PM. If no precipitation is falling and watering is to begin at 1:00 PM, the amount of precipitation fallen between 9:00 AM and the 1:00 PM start time shall be added to the amount of precipitation fallen in the 24 hours prior to 9:00 AM to determine the amount of water to apply. Watering may be suspended when it begins to rain or snow.

For purposes of determining whether the requisite minimum amounts of precipitation have fallen, natural rainfall will be added to artificial rain in the form of water spray onto the coal piles using Tables 1 and 2.

If the temperature is above freezing at 9:00 AM but falls below freezing later during the day, the permittee may suspend spraying for the rest of that calendar day.

For new shipments of coal received after watering or precipitation has ceased, but prior to sunset, the newly arrived coal shall be watered in the amount of 2,000 gallons per 100,000 tons of coal, unless the temperature is 32 degrees Fahrenheit or below or precipitation is falling.

In lieu of spraying water as required under section A.2.c, an alternative dust suppressant system may be employed by written approval from the Ohio EPA.

The permittee shall employ a weather station or equivalent instrumentation that is equipped with anemometer, rain gauge meter, thermometer and wind vane used to determine wind speed, precipitation, temperature and wind direction respectively. The weather station or equivalent instrumentation employed shall have written approval from the Ohio EPA.

The permittee is required to perform daily inspections of all coal piles and adjacent haul roadways.

The purpose of performing inspections is to identify those areas that have not been sufficiently treated with water from the fixed water tower spray system to eliminate visible particulate emissions from storage piles and adjacent haul roads. Then, the permittee must implement control measures, such as applying water from the water tank truck(s) to those areas.

Areas to be inspected where potential emissions are at their greatest include the working face of the coal pile, coal piles located along the Ashtabula River, piles disturbed during load-in and load-out operations and areas affected by high winds from imminent storms.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

Daily inspections shall not be necessary for all coal piles and adjacent haul roadways as exempted in sections A.2.c.i through A.2.c.iii.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep semi diurnal records (i.e., at 9:00 AM and at 1:00 PM) of the following:
 - a. the date;
 - b. the time;
 - c. the ambient temperature;
 - d. the weight of stored coal piles, in tons;
 - e. the precipitation conditions such as:
 - i. present precipitation conditions;
 - ii. amount of natural precipitation, in inches of rainfall, that fell 24 hours before the first semi diurnal reading and the amount that fell between the first and second semi diurnal readings of the day;
 - iii. amount of water sprayed, in gallons, from the fixed water tower spray system, water tank truck(s) and/or other watering measures, as required by Table 1 or Table 2; and
 - iv. the required gallons of water to be applied per Table 1 or Table 2, as appropriate.
- 2. The permittee shall keep daily records of the following:
 - a. the date;
 - b. the weight, in tons, of coal loaded-in the storage piles;
 - c. the weight, in tons, of coal loaded-out the storage piles;
 - d. amount of water sprayed, in gallons, for new shipments of coal received after watering or precipitation has ceased, but prior to sunset from the fixed water tower spray system, water tank truck(s) and/or other watering measures as required in section A.2.h; and
 - e. the required gallons of water to be applied, in gallons, as required in section A.2.h. (i.e., newly arrived coal shall be watered in the amount of 2,000 gallons per 100,000 tons of coal).

3. The permittee shall keep daily inspection records of the following:
 - a. the date;
 - b. whether there were any visible particulate emissions from the storage piles and from the adjacent haul roads; and
 - c. the control measure used.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences: Each day when the minimum volume of water has not been sprayed over the coal storage piles and adjacent haul roads according to the schedules noted in Table 1 and Table 2, excluding any exemptions discussed in section A.2.c.

The deviation report should include the following data during which insufficient amounts of water was sprayed:

 - a. date and time periods;
 - b. semi diurnal ambient temperature, natural rainfall and volume of water sprayed;
 - c. the tons of coal stored each day;
 - d. amount of water sprayed, in gallons, from the water tank truck and from the water spray towers;
 - e. the required gallons of water to be applied per Table 1 or Table 2, as appropriate;
 - f. the cause of the excursion(s) noted;
 - g. the estimated or actual duration of the excursion; and
 - h. the corrective action which has been or will be taken to prevent similar in the future.

Each day when the minimum volume of water has not been sprayed over the coal storage piles according to section A.2.h (i.e., for new shipments of coal received after watering or precipitation has ceased, but prior to sunset. Apply the amount of 2,000 gallons per 100,000 tons of coal received.), excluding the exemption for temperatures 32 degrees Fahrenheit or below and/or precipitation is falling.

Each day when an inspection was not performed, excluding exemptions in sections A.2.c.i through A.2.c.iii.; and Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. Annual reports shall be submitted to the Ohio EPA Northeast District Office that summarize the following data:
 - a. the average number of days for material storage;
 - b. the average moisture content (% weight) of the coal;
 - c. the average silt content (% weight) of the coal;
 - d. the average loader volume, in cubic yards;
 - e. the annual load-in rate, in tons per year;
 - f. the annual load-out rate, in tons per year;
 - g. the average piles size, in tons; and
 - h. an estimate of the actual particulate emissions (tons/year) using equations #3, #4, & #6 noted on page 2-39 of "Reasonably Available Control Measures for Fugitive Dust Sources", Ohio EPA, Office of Air Pollution Control, Columbus, Ohio, September, 1980. Calculations for load-in, load-out and wind erosion emissions must be presented.

These reports shall be submitted by February 15 of each year and shall cover the previous calendar year (January through December).

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

no visible particulate emissions except for 13 minutes during any 60-minute period for coal storage piles (load-in and load-out of storage piles, and wind erosion)

Applicable Compliance Method:

If required, compliance with the emission limitation for storage piles identified above 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," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

Emission Limitation:

Visible emissions of fugitive dust from the stacker/reclaimer 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.

Emission Limitation:

no visible particulate emissions except for 13 minutes during any 60-minute period for the adjacent haul roads around storage piles and parking areas

Applicable Compliance Method:

If required, compliance with the emission limitation for the unpaved haul roads around the storage piles identified above 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," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

1. None