

Facility ID: 0204020227 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: 0204020227 Emissions Unit ID: F003 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>
upper dock coal storage	OAC rule 3745-17-08(B)	See A.2.a below.
	OAC rule 3745-17-07(B)	See A.2.b below.
	OAC rule 3745-19-03(A)	No person or property owner shall cause or allow open burning in a restricted area except as provided in paragraphs (B) to (D) of this rule or in section 3704.11 of the Revised Code.
	OAC rule 3745-15-07(A)	The emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substances or combinations of substances, in such manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and declared to be a public nuisance. It shall be unlawful for any person to cause, permit or maintain any such public nuisance.

2. Additional Terms and Conditions

- (a) Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit. Any reference to 'western coal' in these terms and conditions is intended to include Powder River Basin (PRB) coals and other similar coals mined in the western United States.

B. Operational Restrictions

1. The permittee shall take all reasonably available measures to immediately extinguish coal pile fires caused by spontaneous combustion within the storage pile. See Section F below.
2. The permittee shall not cause, permit or maintain an air pollution public nuisance due to coal pile fires started by spontaneous combustion with the storage pile.

C. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform daily fire inspections of each western coal storage pile.
2. The purpose of the inspections is to determine the need for implementing the fire control measures specified in this permit for each western coal storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
3. The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall keep a record of the date and time of each coal pile fire event, the measures taken to fight the

fire and the duration of the fire.

5. No inspection is required when no western coal is being stored on-site.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) 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 fire control measure, that was to be implemented as a result of an inspection, was not implemented.

The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. None

F. Miscellaneous Requirements

1. A Notice of Violation was issued for the Pittsburgh and Conneaut Dock Co. by the Ohio EPA, Northeast District Office on March 24, 2005. The Notice of Violation was issued to address an air pollution nuisance related to the smoldering western coal pile operations at the facility, caused by spontaneous combustion. The permittee submitted a plan and schedule of corrective action on April 7, 2005 that included the following:
 - a. The permittee shall compress future shipments of western coal in thin layers, as tightly as possible to minimize air pockets within the pile as the pile is constructed. This is to deter spontaneous combustion from starting with the storage pile.
 - b. Storage piles of western coal shall be built to achieve a 30 degree slope and a peaked top to enhance precipitation run-off and drainage. This is to minimize excess moisture within the storage pile, to deter spontaneous combustion from starting with the storage pile.
 - c. The permittee shall maintain onsite a sufficient inventory of chemical fire suppressant for the purposes of extinguishing smoldering coal pile fires should they occur.
 - d. The permittee shall monitor the storage piles of western coal daily and immediately apply sufficient quantities of fire suppressants upon detection of a smoldering coal pile fire, until the fire is completely extinguished.
2. Should the permittee's plan of corrective action be determined by the Ohio EPA to be insufficient to abate the air pollution nuisance, the permittee shall take further measures to abate the situation including but not limited to the installation and operation of temperature monitoring probes within the western coal storage piles.