State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
COLUMBIANA COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 02-22500
Fac ID: 0215130387
DATE: 7/3/2007

Buckeye Columbiana Terminal
Rosemary Lacher
P.O. Box 389
Lisbon, OH 44432

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 7/3/2007**
Terms and Conditions	**Effective Date: 7/3/2007**

FINAL PERMIT TO INSTALL 02-22500

Application Number:	02-22500
Facility ID:	0215130387
Permit Fee:	**$1000**
Name of Facility:	Buckeye Columbiana Terminal
Person to Contact:	Rosemary Lacher
Address:	P.O. Box 389 Lisbon, OH 44432

Location of proposed air contaminant source(s) [emissions unit(s)]:
Clark Ave., near Aten Ave.
Wellsville, **Ohio**

Description of proposed emissions unit(s):
Roadways, storage piles, Barge material unloading and loading, Rail material unloading and loading, Truck material unloading and loading.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
PE	110.33
PM10	39.94

Emissions Unit ID: **F001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (F001) - Unpaved roadways and parking area

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions (PE) shall not exceed 15.12 tons per year. Fugitive emissions of particulate matter of 10 microns or less (PM10) shall not exceed 3.85 tons per year. There shall be no visible particulate emissions of fugitive dust from the unpaved roadway and parking area except for a time not to exceed 3 minutes during any 60-minute observation period. Best available control measures that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust. See sections A.2.a through A.2.e.
OAC rule 3745-17-07(B)(5)	The visible particulate emissions limitation specified by this rule is less stringent than the visible particulate emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08	See sections A.2.a through A.2.e.

2. Additional Terms and Conditions

2.a The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to the following:

i. treat the unpaved roadways and parking area by watering at sufficient treatment frequencies to ensure compliance; and

ii. establish and enforce a speed limit of less than 10 mph on all roadways.

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

2.b The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for unpaved roadways and parking area that are 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

2.c Any unpaved roadway or parking area that is subsequently paved, will require a permit modification for paved roadways and parking area.

2.d Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

2.e Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform daily inspections of each of the roadway segments and parking area.

2. The purpose of the daily 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 may, upon receipt of written approval from Ohio EPA's Northeast District Office, modify the above-mentioned inspection frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. 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.

   The information required in section C.4.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, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

   b. each instance when a control measure, that was to be implemented 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. Emission Limitations:

Fugitive PE shall not exceed 15.12 tons per year.

Fugitive PM10 shall not exceed 3.85 tons per year.

Applicable Compliance Method:

Compliance with the annual fugitive particulate and PM10 emission limitations shall be determined by the following equation:

$$E = (EF \times VMT \times ton/2{,}000\ lbs)_{dump\ truck} + (EF \times VMT \times ton/2{,}000\ lbs)_{passenger\ vehicle}$$

where:

E = Emissions of fugitive particulates or PM10, in ton per year

EF = Emission factor, in lb PE/Vehicle Miles Traveled, taken from Equations (1a) and (2) from AP-42 Chapter 13.2.2-4 (11/06). $EF = k(s/12)^a (W/3)^b \times [(365-P) / 365] \times (1 - CE)$, where k = 4.0 for PE and 1.5 for PM10, s = 5.0, a = 0.7 for PE and 0.9 for PM10, b = 0.45, W = 27.5 tons for the dump trucks and 2.0 tons for the passenger vehicles and P = number of days in a year with at least 0.01 inch of precipitation. The emissions limits provided in this permit were based on a maximum of 14,192 vehicle miles traveled per year by the dump trucks, a maximum of 237 vehicle miles traveled per year by the passenger vehicles, and a control efficiency (CE) of 50% (or 0.50) provided by the watering.

VMT = Vehicle Miles Traveled, in miles per year.

2. Emission Limitation:

There shall be no visible particulate emissions of fugitive dust from the unpaved roadway and parking area except for a time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

Emissions Unit ID: **F001**

If required, compliance with the visible particulate emission limitation listed 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").

F. Miscellaneous Requirements

None

Issued: 7/3/2007

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (F002) - Storage piles, wind erosion only, on an surface area of 1.7 acres

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions (PE) shall not exceed 0.54 ton per year. Fugitive emissions of particulate matter of 10 microns or less (PM10) shall not exceed 0.27 ton per year. There shall be no visible particulate emissions of fugitive dust from the storage pile except for a time not to exceed 1 minute during any 60-minute observation period. Best available control measures that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust. See sections A.2.a through A.2.c.
OAC rule 3745-17-07(B)(6)	The visible particulate emissions limitation specified by this rule are less stringent than the visible particulate emissions limitation established pursuant to OAC rule 3745-31-05(A)(5).
OAC rule 3745-17-08(B)	See sections A.2.a through A.2.c.

2. Additional Terms and Conditions

2.a The permittee shall employ best available control measures for wind erosion from the surface of 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 the following as control measures:

i. installation and maintenance of a Dust Solutions Incorporated

Windtamer[R] wind fence to reduce the potential for entrainment of fugitive particulate emissions by reducing the velocity of wind as it contacts the storage piles. This fence shall enclose the 1.7 acre area where the storage piles are located and the area for the first dump pile created when the trucks bring in material; and

ii. installation and maintenance of spray foggers to deliver a chemical dust suppressant. This dust suppressant produces a crust on the surface of each storage pile to reduce wind entrainment of fine particulates.

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

2.b The application of a dust suppressant shall be employed for wind erosion for the storage piles 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. Implementation of the control measure shall not be necessary for storage piles that are 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. The wind fence shall also be repaired, adjusted, or replaced as soon as possible if an inspection reveals the fence to be damaged or inoperable.

2.c 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).

B. Operational Restrictions

1. The storage piles shall consist of coal, sand, gravel, limestone, ash and/or petroleum coke. No construction & demolition debris or other materials shall be stored.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform daily inspections of the wind erosion from the pile surfaces associated with each storage pile.

2. No inspection shall be necessary for wind erosion from the surface of the storage piles

when the piles are covered with snow and/or ice and 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 purpose of the inspections is to determine the need for implementing the control measure (application of a dust suppressant) specified in this permit for wind erosion from the surface of the storage piles. Another purpose of the inspections is to verify that the wind fence is not damaged, and it is still functioning as intended. The inspections shall be performed during representative, normal storage pile operating conditions.

4. 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;

   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 measures; and

   e. any occasion when a material other than coal, sand, gravel, limestone, ash or petroleum coke was stored in a pile.

D. Reporting Requirements

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

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation;

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

c. each occasion when a material other than coal, sand, gravel, limestone, ash or petroleum coke was stored in a pile.

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. Emission Limitations:

Fugitive PE shall not exceed 0.54 ton per year.

Fugitive PM10 shall not exceed 0.27 ton per year.

Applicable Compliance Method:

Compliance with the annual fugitive particulate and PM10 emission limitations shall be determined by the following equation:

E = EF (lb/day/acre) x 365 days x 1.7 acres x ton/2,000 lbs

where:

E = PE or PM10 emissions, in tons/year

EF = Emission Factor, as calculated from the equation in USEPA's Control of Open Fugitive Dust Sources, September 1988:

EF = (k) x (s/1.5) x [(365 - p)/235] x (f/15)

where;

EF = Emission factor, in lb PE/day/acre or lb PM10/day/acre

k = 1.7 for PE, 0.85 for PM10

s = silt content of the stored material, weight percent, = reported to be 5%

with the use of Ultrabond 2000™ crusting agent.

p = number of days with > 0.01 inches of precipitation per year, = 150, taken from AP-42 Figure 13.2.1-2, (11/06).

f = percentage of time wind speed exceeds 12 mph, = 5% with the use of the Windtamer® wind fence.

2. Emission Limitation:

There shall be no visible particulate emissions of fugitive dust from the storage piles except for a time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation listed 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").

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

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 specified in narrative form following the table.

Operations, Property, and/or Equipment -(F003) - Barge material unloading and loading

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions (PE) shall not exceed 11.00 tons per year. Fugitive emissions of particulate matter of 10 microns or less (PM10) shall not exceed 5.20 tons per year. No visible emissions of fugitive dust at each point of material transfer controlled by the water fogging system, except for a time not to exceed 3 minutes during any 60-minute observation period. Visible particulate emissions of fugitive dust at the point of material transfer not controlled by the water fogging system shall not exceed 5% opacity as a 3-minute average. Best available control measures that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust. See sections A.2.a and A.2.b.
OAC rule 3745-17-07(B)(1)	The visible particulate emissions limitation specified by this rule is less stringent than the visible particulate emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08	See sections A.2.a and A.2.b.

2. Additional Terms and Conditions

2.a The permittee shall employ best available control measures on the barge material unloading and loading operation for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to the following:

i. installation and maintenance of a water fogging system for the control of fugitive dust at the points identified in the permittee's application where the material is transferred. The permittee's application reports 7 points for material unloading from the barge to the storage piles and 3 points for material loading from the storage piles to the barge that will be controlled by the water fogging system. The point of material transfer from the barge to a hopper is not controlled by the water fogging system; and

ii. enclosures over all the conveyors used to transfer the material.

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

2.b 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).

B. Operational Restrictions

1. The speed of the stamler feeders, conveyors and radial stackers shall not exceed 1,500 tons per hour.

2. The water fogging system shall be employed on the 7 points of material transfer for barge unloading and the 3 points of material transfer for barge loading, as identified in the application, when this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the points of material transfer. The presence or absence of any visible emissions and its location shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the color of the emissions;
   b. the total duration of any visible emission incident; and
   c. any corrective actions taken to eliminate the visible emissions.

2. The permittee shall perform daily inspections of the water fogging system and the

enclosures over the conveyors. The purpose of the inspections is to determine if these control measures are operational, and/or in need of repair and/or replacement. The permittee shall record inspection findings, and any subsequent corrective actions, in the operations log.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month periods.

E. Testing Requirements

1. Emission Limitations:

   Fugitive PE shall not exceed 11.00 tons per year.

   Fugitive PM10 shall not exceed 5.20 tons per year.

   Applicable Compliance Method:

   The annual fugitive particulate and PM10 emission limitations were calculated using the maximum design capacity of the conveyors (1,500 tons per hour) and the use of the water fogging system at the material transfer points identified in the application. Compliance with these emission limitations shall be assumed if the permittee complies with the additional terms and conditions in section A.2 and with the operational restrictions in section B.

2. Emission Limitation:

   No visible emissions of fugitive dust at each point of material transfer controlled by the water fogger, except for a time not to exceed 3 minutes during any 60-minute observation period.

   Applicable Compliance Method:

   If required, compliance with the visible particulate emission limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test

Method" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

3. Emission Limitation:

Visible particulate emissions of fugitive dust at the point of material transfer not controlled by the water fogging system (Unloading material off Barge to Hopper) shall not exceed 5% 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.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

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 specified in narrative form following the table.

Operations, Property, and/or Equipment -(F004) - Rail material unloading and loading

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions (PE) shall not exceed 66.62 tons per year. Fugitive emissions of particulate matter of 10 microns or less (PM10) shall not exceed 22.56 tons per year. No visible emissions of fugitive dust at each point of material transfer controlled by the water fogging system, except for a time not to exceed 3 minutes during any 60-minute observation period. Best available control measures that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust. See sections A.2.a and A.2.b.
OAC rule 3745-17-07(B)(1)	The visible particulate emissions limitation specified by this rule is less stringent than the visible particulate emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08	See sections A.2.a and A.2.b.

2. Additional Terms and Conditions

2.a The permittee shall employ best available control measures on the rail material unloading and loading operation for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to the following:

i. installation and maintenance of a water fogging system for the control of fugitive dust at the points identified in the permittee's application where the material is transferred. The permittee's application reports 4 points

for material unloading from the rail to the storage piles and 3 points for material loading from the storage piles to the barge that will be controlled by the water fogging system;

ii. enclosures over all the conveyors used to transfer the material; and

iii. watering the road where material is transferred from the rail to the stamler feeder, if the rail dump method is not used.

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

2.b 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).

B. Operational Restrictions

1. The speed of the stamler feeder, conveyors and radial stackers shall not exceed 1,500 tons per hour.

2. The water fogging system shall be employed on the 4 points of material transfer for rail unloading and the 3 points of material transfer for rail loading, as identified in the application, when this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the points of material transfer. The presence or absence of any visible emissions and its location shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the color of the emissions;
   b. the total duration of any visible emission incident; and
   c. any corrective actions taken to eliminate the visible emissions.

2. The permittee shall perform daily inspections of the water fogging system and the enclosures over the conveyors. The purpose of the inspections is to determine if these control measures are operational, and/or in need of repair and/or replacement. The

permittee shall record inspection findings, and any subsequent corrective actions, in the operations log.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month periods.

E. Testing Requirements

1. Emission Limitations:

   Fugitive PE shall not exceed 66.62 tons per year.

   Fugitive PM10 shall not exceed 22.56 tons per year.

   Applicable Compliance Method:

   The annual fugitive particulate and PM10 emission limitations were calculated using the maximum design capacity of the conveyors (1,500 tons per hour) and the use of the water fogging system at the material transfer points identified in the application. Compliance with these emission limitations shall be assumed if the permittee complies with the additional terms and conditions in section A.2 and with the operational restrictions in section B.

2. Emission Limitation:

   No visible emissions of fugitive dust at each point of material transfer controlled by the water fogger, except for a time not to exceed 3 minutes during any 60-minute observation period.

   Applicable Compliance Method:

   If required, compliance with the visible particulate emission limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Method" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

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 specified in narrative form following the table.

Operations, Property, and/or Equipment -(F005) - Material unloading and loading from trucks

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions (PE) shall not exceed 17.05 tons per year. Fugitive emissions of particulate matter of 10 microns or less (PM10) shall not exceed 8.06 tons per year. No visible emissions of fugitive dust at each point of material transfer controlled by the water fogging system, except for a time not to exceed 3 minutes during any 60-minute observation period. Visible particulate emissions of fugitive dust at the point of material transfer not controlled by the water fogging system shall not exceed 5% opacity as a 3-minute average. Best available control measures that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust. See sections A.2.a and A.2.b.
OAC rule 3745-17-07(B)(1)	The visible particulate emissions limitation specified by this rule is less stringent than the visible particulate emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08	See sections A.2.a and A.2.b.

2. Additional Terms and Conditions

2.a The permittee shall employ best available control measures on the truck material unloading and loading operation for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to the following:

i. installation and maintenance of a water fogging system for the control of fugitive dust at the points identified in the permittee's application where the material is transferred. The permittee's application reports 1 point (J1) for material unloading from the trucks to the storage piles and no points for material loading from the storage piles to the trucks that will be controlled by the water fogging system. There are 2 points (B & K) of material transfer from the trucks to the storage piles and 1 point (E) of material transfer from the storage piles to the trucks that are not controlled by the water fogging system; and

ii. enclosures over all the conveyors used to transfer the material.

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

2.b 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).

B. Operational Restrictions

1. The speed of the stamler feeders, conveyors, and radial stackers shall not exceed 1,500 tons per hour.

2. The water fogger system shall be employed on the one point of material transfer for truck unloading, as identified in the application, when this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the points of material transfer. The presence or absence of any visible emissions and its location shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the color of the emissions;
   b. the total duration of any visible emission incident; and
   c. any corrective actions taken to eliminate the visible emissions.

2. The permittee shall perform daily inspections of the water fogging system and the enclosures over the conveyors. The purpose of the inspections is to determine if these control measures are operational, and/or in need of repair and/or replacement. The permittee shall record inspection findings, and any subsequent corrective actions, in the operations log.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month periods.

E. Testing Requirements

1. Emission Limitations:

   Fugitive PE shall not exceed 17.05 tons per year.

   Fugitive PM10 shall not exceed 8.06 tons per year.

   Applicable Compliance Method:

   The annual fugitive particulate and PM10 emission limitations were calculated using the maximum design capacity of the conveyors (1,500 tons per hour) and the use of the water fogging system at the material transfer points identified in the application. Compliance with these emission limitations shall be assumed if the permittee complies with the additional terms and conditions in section A.2 and with the operational restrictions in section B.

2. Emission Limitation:

   No visible emissions of fugitive dust at each point of material transfer controlled by the water fogger, except for a time not to exceed 3 minutes during any 60-minute observation period.

   Applicable Compliance Method:

   If required, compliance with the visible particulate emission limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Method" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

3. Emission Limitation:

   Visible particulate emissions of fugitive dust at the point of material transfer not

controlled by the water fogging system (Unloading material off Barge to Hopper) shall not exceed 5% 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.

F. Miscellaneous Requirements

None