



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

11/23/2011

Jim Holdren  
North Central Processing  
PO Box 93941  
Cleveland, OH 44101

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0448020101  
Permit Number: P0108996  
Permit Type: Initial Installation  
County: Lucas

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Josh Mandel," 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

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: TDES





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
North Central Processing**

Facility ID:	0448020101
Permit Number:	P0108996
Permit Type:	Initial Installation
Issued:	11/23/2011
Effective:	11/23/2011
Expiration:	11/23/2021





Division of Air Pollution Control
Permit-to-Install and Operate
for
North Central Processing

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## Authorization

Facility ID: 0448020101  
Application Number(s): A0043097, A0043100  
Permit Number: P0108996  
Permit Description: Installation of a coal and coke drying and screening operation with baghouse.  
Permit Type: Initial Installation  
Permit Fee: \$1,200.00  
Issue Date: 11/23/2011  
Effective Date: 11/23/2011  
Expiration Date: 11/23/2021  
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

North Central Processing  
3855 York Street  
Oregon, OH 43616

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

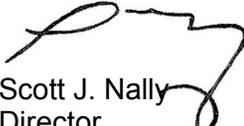
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

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

  
Scott J. Nally  
Director

## Authorization (continued)

Permit Number: P0108996

Permit Description: Installation of a coal and coke drying and screening operation with baghouse.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	Storage piles
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	Carbon dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

## **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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 Toledo Department of Environmental Services 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<sup>1</sup> 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 emissions 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.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

**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.

**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.

## **B. Facility-Wide Terms and Conditions**



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.
2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and Y: F002 and P901. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.
3. The permittee shall comply with the applicable fugitive coal dust emissions control plan requirements required under 40 CFR Part 60, Subpart Y, including the following sections.

60.254(c)	The permittee shall prepare and operate in accordance with a submitted fugitive coal dust emissions control plan for open storage piles (which includes the equipment used in the loading, unloading, and conveying operations) that is appropriate for the site conditions as specified in 60.254(c)(1) through (c)(6). The fugitive coal dust emissions control plan shall be submitted for approval to the Toledo Division of Environmental Services prior to startup.
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## **C. Emissions Unit Terms and Conditions**



1. F002, Storage piles

Operations, Property and/or Equipment Description:

Coal, coke, and baghouse dust storage piles including load-in, load-out and wind erosion activities

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 operation(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 are identified below. 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)	3.1 tons/year of fugitive particulate matter of 10 microns or less (PM10)  6.4 tons/year of fugitive particulate emissions (PE)  no visible PE except for one minute during any 60-minute period  best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See b)(2)a. through b)(2)e.)

b.	<p>OAC rule 3745-17-07(B)</p> <p>(applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)</p>	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
c.	<p>OAC rule 3745-17-08(B)</p> <p>(applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)</p>	<p>(See b)(2)a. through b)(2)e.)</p>
d.	<p>40 CFR Part 60, Subpart Y (40 CFR 60.250 – 60.258)</p> <p>[In accordance with 40 CFR 60.254(c), this emissions unit contains an open coal storage pile which includes the equipment used in the loading and unloading of the open storage pile that commenced construction after May 27, 2009 subject to the emissions limitations/control measures specified in this section.]</p>	<p>The permittee must prepare and operate in accordance with a fugitive coal dust emissions control plan that is appropriate for the site conditions as specified in 40 CFR 60.254(c)(1) through (c)(6).</p> <p>see b)(2)g.</p>
e.	<p>40 CFR Part 60, Subpart A (40 CFR 60.1 – 60.19)</p>	<p>see b)(2)h.</p>

(2) Additional Terms and Conditions

- a. 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 maintain minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.
- b. The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage 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. 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.

- d. 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 perform one or more of the following: (chemical stabilization, watering/sprinkling systems/hoses, covering the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. 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.
- f. 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).
- g. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- h. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.

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:

storage pile identification

minimum load-out inspection frequency

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:

storage pile identification

minimum wind erosion inspection frequency

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.

- (7) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart Y, including the following sections.



60.255(c)	prepare and operate in accordance with a submitted fugitive coal dust emissions control plan as specified in 60.255(c)(1) through (c)(6)
60.255(c)(1)	identify and describe control measures used to minimize coal dust emissions from the affected facility
60.255(c)(2)	required fugitive coal dust emissions control measures; explain how measures selected are applicable and appropriate for the site conditions; revise plan as needed to reflect changing conditions
60.255(c)(3)	may petition to U.S. EPA Administrator for inclusion in the plan of alternative control measures to 60.255(c)(2)
60.255(c)(5)	objection to fugitive coal dust emissions control plan
60.255(c)(6)	chemical dust suppressant requirements
60.258(a)	maintain a written or electronic logbook on-site of the information specified in 60.258(a)(1) through (a)(6)

e) Reporting Requirements

- (1) Pursuant to the 40 CFR Part 60.7, the permittee 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

P. O. Box 1049

Columbus, Ohio 43216-1049

and



Toledo Division of Environmental Services

Air Section

348 South Erie Street

Toledo, Ohio 43604

- (2) 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.
- (3) The permittee shall submit notifications and reports to the Toledo Division of Environmental Services as are required pursuant to 40 CFR Part 60, Subpart Y, including the following sections.

60.255(c)(4)	submit the fugitive coal dust emissions control plan to Toledo Division of Environmental Services (TES) prior to startup; revise plan as needed and submit to TES prior to operating according these revisions
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f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emissions Limitations:

3.1 tons/year of fugitive PM10

6.4 tons/year of fugitive PE

Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor equations in Sections 13.2.4 and 13.2.5, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 1/95), for load-in operations, load-out operations, and wind erosion. These emission limits were based on General Permit 7.2 for a maximum production of 3,000,000 tons per year, a maximum storage surface area less than or equal to 6 acres, and a 95 % overall control efficiency for PE and PM10.

b. Emission Limitation:

There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible PE limitations for 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]).

## g) Miscellaneous Requirements

- (1) None.



2. P901, Carbon dryer

Operations, Property and/or Equipment Description:

20 tons/hr natural gas-fired coal and coke drying plant. Coal or coke is unloaded from trucks onto the ground. Material is loaded into a hopper by front-end loader and conveyed to the 25 mmBtu/hr natural gas-fired rotary dryer. Dry product is conveyed by enclosed bucket elevator to a screener, screened product is conveyed by one, of two, enclosed screw conveyors to storage silos. Oversized material from the screener is conveyed by belt conveyor to a storage pile. Product is loaded out from silos by an enclosed screw conveyor with hose to tank trucks. Emissions from the dryer and screener are vented to a common baghouse.

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. b)(1)c., b)(2)e., f)(1)e., f)(1)j., f)(1)k.

(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 operation(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 are identified below. 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) as effective 11/30/2001	Carbon monoxide (CO) emissions shall not exceed 2.1 pounds per hour and 9.2 tons per year from the baghouse stack.  Nitrogen oxides (NOx) emissions shall not exceed 1.4 pounds per hour and 6.1 tons per year from the baghouse stack.  Combined stack and fugitive particulate emissions (PE) shall not exceed 1.8 pounds per hour and 5.8 tons per year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>PE from the baghouse serving this emissions unit shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.02 pound per hour and 0.09 ton per year from the baghouse stack.</p> <p>Volatile organic compound (VOC) emissions shall not exceed 0.66 pound per hour and 2.9 tons per year from the baghouse stack.</p> <p>Visible particulate emissions from any stack serving this emissions unit shall be less than 10 percent opacity.</p> <p>Visible emissions of fugitive dust from this emissions unit shall be less than 10 percent opacity.</p> <p>see b)(2)a. and b)(2)b.</p>
b.	OAC rule 3745-31-05(a)(3)(a)(ii) as effective 12/01/2006	see b)(2)c. and b)(2)d.
c.	OAC rule 3745-31-05(E) as effective 12/01/2006	see b)(2)c. and b)(2)e.
d.	OAC rule 3745-17-07(A)(1)	see b)(2)f.
e.	OAC rule 3745-17-07(B)	see b)(2)f.
f.	OAC rule 3745-17-08(B)	see b)(2)j. through m.
g.	OAC rule 3745-17-11(B)	see b)(2)f.
h.	<p>40 CFR Part 60, Subpart Y (40 CFR 60.250 – 60.258)</p> <p>[In accordance with 40 CFR 60.250(d), this emissions unit consists of a thermal dryer, coal processing and conveying equipment, coal storage systems, and transfer and loading systems that commenced construction after May 27, 2009 subject to the emissions limitations/control measures specified in this section.]</p>	<p>Visible stack and fugitive particulate emissions from this emissions unit when processing coal shall be less than 10 percent opacity.</p> <p>PE when processing coal shall not exceed 0.023 gram per dry standard cubic meter (0.010 grain per dry standard cubic foot) from any mechanical vent serving this emissions unit.</p> <p>see b)(2)g and b)(2)h.</p>
i.	40 CFR Part 60, Subpart A (40 CFR 60.1 – 60.19)	see b)(2)i.

- (2) Additional Terms and Conditions
- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
  - b. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart Y.
  - c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
  - d. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NO<sub>x</sub>, SO<sub>2</sub>, and VOC emissions from this air contaminant source since the uncontrolled potential to emit for CO, NO<sub>x</sub>, SO<sub>2</sub>, and VOC is each less than 10 tons/year.
  - e. Permit to Install and Operate P0108996 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. emissions from the dryer and screener shall be captured and vented to a baghouse with a maximum particulate emissions rate of 0.010 grain per dry standard cubic foot of exhaust gases;
    - ii. visible stack particulate emissions and visible particulate emissions of fugitive dust shall be less than 10% opacity; and
    - iii. combined stack and fugitive particulate emissions shall not exceed 5.8 tons per year.
  - f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(E).
  - g. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio

Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

- h. Per 60.252(b)(2)(iii), this emissions unit is not subject to the SO<sub>2</sub> limitations specified by 60.252(b)(2) since all thermal input to the dryer is from natural gas. Per 60.252(b)(3)(iii) this emissions unit is not subject to the combined NO<sub>x</sub> and CO limits specified by 60.252(b)(3), since all thermal input to the dryer is from natural gas.
- i. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- j. The material handling operation(s) that are covered by this permit and subject to the requirements of OAC rule 3745-17-08 are listed below:  
  
 truck dump, load-in to hopper, dryer, screener, material transfer and conveying, storage silos, product loading.
- k. 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:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
truck dump	maintain moisture content
load-in to hopper	maintain moisture content
dryer	baghouse
screener	enclosure vented to baghouse
belt conveyors	maintain moisture content
bucket elevators	fully enclosed
screw conveyors	fully enclosed
silos	fully enclosed
product loading	enclosed screw conveyor with hose to tank truck

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

- l. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) 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(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

- m. 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 3745-17-08.

c) Operational Restrictions

- (1) The permittee shall operate the baghouse serving the dryer and screener for the control of particulate emissions whenever the dryer or screener is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the baghouse serving the dryer and screener was not in service when the dryer or screener was in operation.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions 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 location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d.) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.



- (3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart Y, including the following sections.

60.255(h)(2)	conduct monthly visual observations of all process and control equipment associated with each coal truck dump operation and perform necessary maintenance to correct deficiencies as soon as possible
60.258(a)	maintain a written or electronic logbook onsite containing the information required to be recorded under 60.258(a)(1) through (a)(6) and (a)(8)

e) Reporting Requirements

- (1) Pursuant to the 40 CFR Part 60.7, the permittee 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  
P. O. Box 1049  
Columbus, Ohio 43216-1049

and

Toledo Division of Environmental Services  
Air Section  
348 South Erie Street  
Toledo, Ohio 43604

- (2) The permittee shall notify the Toledo Division of Environmental Services in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (5) The permittee shall submit notifications and reports to the Toledo Division of Environmental Services as are required pursuant to 40 CFR Part 60, Subpart Y, including the following sections.

60.258(b), (b)(3)	submit semiannual reports of all 6-minute average opacities that exceed the applicable standard
60.258(c)	submit results of initial performance tests; when electing to comply with reduced performance testing per 60.255(c) or (d), include the performance test report identification of each affected facility subject to reduced testing; if electing to comply with 60.255(d), also include information which demonstrates the control devices are identical
60.258(d)	within 60 days of completing each performance evaluation conducted to demonstrate compliance with this subpart, submit test data to U.S. EPA via EPA's WebFIRE database available at <a href="http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main">http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main</a> or for those that cannot be entered into WebFIRE (Method 9 tests), mail to United States Environmental Protection Agency; Energy Strategies Group; 109 TW Alexander DR; mail code: D243-01; RTP, NC 27711

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

CO emissions shall not exceed 2.1 pounds per hour and 9.2 tons per year from the baghouse stack.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation using Methods 1 thru 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The ton per year emission limitation was developed by multiplying the short-term allowable CO emission limitation (2.1 lb/hr) by the maximum annual operating hours (8,760 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

b. Emission Limitation:

NOx emissions shall not exceed 1.4 pounds per hour and 6.1 tons per year from the baghouse stack.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation using Methods 1 thru 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The ton per year emission limitation was developed by multiplying the short-term allowable NOx emission limitation (1.4 lb/hr) by the maximum annual operating hours (8,760 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

c. Emission Limitation:

Stack and fugitive particulate emissions (PE) shall not exceed 1.8 pounds per hour and 5.8 tons per year.

Applicable Compliance Method:

This emission limitation is based on the summation of emissions from the individual emission points associated with this emissions unit: truck dump, dryer

and screener stack, transfer and conveying, silo vents, and product loadout. Compliance may be determined by the following calculations.

The particulate emission factors for wet carbon ( $1.3\text{E-}03$  lb/ton) and dry carbon ( $1.5\text{E-}02$  lb/ton) transfer operations were calculated using AP-42 Section 13.2.4 Equation (1) dated 11/06 with a wet carbon moisture content of 5.79%, a dry moisture content of 1%, and an average wind speed of 10 mph. The allowable particulate emissions from the dryer and screener stack are based on 0.010 grain PE per dscf of exhaust gases and a maximum stack flow rate of 5798 dscfm.

For the truck dump, multiply the dry particulate emissions factor ( $1.3\text{E-}03$  lb/ton) by the maximum unloading rate (100 tons/hr) to determine the hourly particulate emissions (0.13 lb/hr).

For the hopper loading and hopper conveyor transfer point, multiply the dry particulate emissions factor ( $1.3\text{E-}03$  lb/ton) by the maximum processing rate (20 tons/hr), and multiply by 2 transfer points to determine the hourly particulate emissions (0.052 lb/hr).

For the dryer and screener stack emissions, multiply the maximum grain loading (0.010 grain/dscf) by the maximum stack flow rate (5798 dscfm), divide by 7000 grains per pound, and multiply by 60 minutes per hour to determine the hourly particulate emissions (0.50 lb/hr).

For the dryer to bucket elevator, screener to oversize conveyor and screw conveyor, multiply the dry particulate emission factor ( $1.5\text{E-}02$  lb/ton) by the maximum processing rate (20 tons/hr), and multiply by 2 transfer points to determine the hourly particulate emissions (0.6 lb/hr).

For the silo vents, multiply the dry particulate emission factor ( $1.5\text{E-}02$  lb/ton) by the maximum processing rate (20 tons/hr), and multiply by the estimated control efficiency (1-0.80) for the enclosed silo to determine the hourly particulate emissions (0.06 lb/hr).

For product loading into tank trucks, multiply the dry particulate emission factor ( $1.5\text{E-}02$  lb/ton) by the maximum loading rate (100 tons/hr), and multiply by the estimated control efficiency (1-0.75) for the hose to tank truck loading to determine the hourly particulate emissions (0.38 lb/hr).

Sum the individual emissions to determine the total hourly emissions from this emissions unit:  $0.13 + 0.052 + 0.50 + 0.6 + 0.06 + 0.38 = 1.8$  lbs/hr PE

For determining annual emissions, multiply each emissions point, except for the truck dump and product loading, by 8760 hours per year divided by 2,000 pounds per ton to determine annual emissions. For the truck dump and product loading, multiply the hourly emissions rate by a factor of 20/100, since on an annual basis, the amount of material handled is restricted by the drying capacity of 20 tons/hr.

$[0.13(20/100) + .052 + 0.5 + 0.6 + 0.06 + 0.38(20/100)](8,760 \text{ hrs/yr})(\text{ton}/2000\text{lb}) = 5.8 \text{ tons/yr PE}$

d. Emission Limitation:

Particulate emissions from any mechanical vent serving this emissions unit shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases when processing coal.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the methods and procedures specified by 40 CFR 60.257(b).

e. Emission Limitation:

PE from the baghouse serving this emissions unit shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the methods and procedures specified by 40 CFR 60.257(b).

f. Emission Limitation:

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.02 pound per hour and 0.09 ton per year from the baghouse stack.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation using Methods 1 thru 4 and 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The ton per year emission limitation was developed by multiplying the short-term allowable SO<sub>2</sub> emission limitation (0.02 lb/hr) by the maximum annual operating hours (8,760 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

g. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.66 pound per hour and 2.9 tons per year from the baghouse stack.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Methods 1 thru 4 and 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method

25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The ton per year emission limitation was developed by multiplying the short-term allowable VOC emission limitation (0.66 lb/hr) by the maximum annual operating hours (8,760 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

h. Emission Limitation:

Visible stack particulate emissions when processing coal shall be less than 10 percent opacity.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Method 9 of 40 CFR Part 60, Appendix A, and the procedures specified by 40 CFR 60.257(a)(1) and (a)(3). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

i. Emission Limitation:

Visible fugitive particulate emissions when processing coal shall be less than 10 percent opacity.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Method 9 of 40 CFR Part 60, Appendix A, and the procedures of 40 CFR 60.257(a)(2) and (a)(3) for all fugitive emission points, except for the truck dump. If required, the permittee shall demonstrate compliance for the truck dump using Method 9 of 40 CFR Part 60 Appendix A, and the methods and procedures of 40 CFR 60.255(h)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

j. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall be less than 10 percent opacity.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Method 9 of 40 CFR Part 60, Appendix A, and the procedures specified by 40 CFR 60.257(a)(1) and (a)(3). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

## k. Emission Limitation:

Visible particulate emissions of fugitive dust from this emissions unit shall be less than 10 percent opacity.

## Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using Method 9 of 40 CFR Part 60, Appendix A, and the procedures of 40 CFR 60.257(a)(2) and (a)(3) for all fugitive emission points, except for the truck dump. If required, the permittee shall demonstrate compliance for the truck dump using Method 9 of 40 CFR Part 60 Appendix A, and the methods and procedures of 40 CFR 60.255(h)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

## (2) The permittee shall conduct, or have conducted, initial emission testing for this emissions unit 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.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable concentration of particulate matter in the exhaust stream of the baghouse serving the dryer and screener (0.010 grains per dry standard cubic foot), and to demonstrate compliance with the opacity standard for each affected facility as defined by 40 CFR 60.250(d). The emission testing shall be conducted while processing coal. If coal is not being processed during this time period, then the permittee shall conduct the emission testing while processing coke, and then within 60 days of the date of switching over to processing coal, the permittee shall perform emission testing again while processing coal.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
  - i. for opacity, the methods and procedures specified by 40 CFR 60.257(a)(1) through (a)(3), 60.255(h)(1), and 60.8; and
  - ii. for particulate concentration, the methods and procedures specified by 40 CFR 60.257(b)(1) through (b)(5) and 40 CFR 60.8.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the

tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Services' refusal to accept the results of the emission test(s).
  - f. Personnel from the Toledo Division of Environmental Services 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.
  - g. 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 Toledo Division of Environmental Services 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. The report shall also be submitted to U.S.EPA as specified in e)(5).
- (3) After the initial performance testing has been conducted according to f)(2), the permittee shall comply with the following testing requirements when processing coal as are required pursuant to 40 CFR Part 60, Subpart Y, including the following sections.

60.255(h)(3)	conduct a Method 9 performance test at least once every 5 years for the coal truck dump operation
60.255(b)(1)	a new performance test must be conducted to determine compliance with the 0.010 grain/dscf particulate emission limitation according to the requirements of 60.255(b)(1)(i) through (iii)
60.255(b)(2)	for each affected facility subject to an opacity standard, a new performance test must be conducted according to the requirements of 60.255(b)(2)(i) through (iii)
60.255(f)	as an alternative to the requirements of 60.255(b)(2), the permittee may elect to comply with the requirements of 60.255(f)(1) or (f)(2)

- g) Miscellaneous Requirements
  - (1) None.