



Environmental Protection Agency

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

5/1/2012

DAVID BIRD
CARGILL DEICING TECHNOLOGY
PO BOX 6920
CLEVELAND, OH 44101

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318000397
Permit Number: P0109078
Permit Type: OAC Chapter 3745-31 Modification
County: Cuyahoga

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 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 Cleveland Division of Air Quality at (216)664-2297 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, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CARGILL DEICING TECHNOLOGY**

Facility ID: 1318000397
Permit Number: P0109078
Permit Type: OAC Chapter 3745-31 Modification
Issued: 5/1/2012
Effective: 5/1/2012
Expiration: 8/10/2020



Division of Air Pollution Control
Permit-to-Install and Operate
for
CARGILL DEICING TECHNOLOGY

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions 10
1. Emissions Unit Group -Conveyors #6 and #7: F018,F019,..... 11

Authorization

Facility ID: 1318000397
Application Number(s): A0042878
Permit Number: P0109078
Permit Description: This is a Chapter 31 modification PTIO for existing sources installed before January 1, 1974. Emission Unit F018 is conveyor #6 and Emission Unit F019 is Conveyor #7. The conveyors are being modified to increase belt width from 30 inches to 42 inches.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00
Issue Date: 5/1/2012
Effective Date: 5/1/2012
Expiration Date: 8/10/2020
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

CARGILL DEICING TECHNOLOGY
2400 SHIPS CHANNEL
CLEVELAND, OH 44113

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

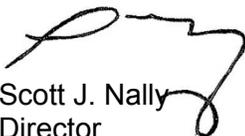
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0109078

Permit Description: This is a Chapter 31 modification PTIO for existing sources installed before January 1, 1974. Emission Unit F018 is conveyor #6 and Emission Unit F019 is Conveyor #7. The conveyors are being modified to increase belt width from 30 inches to 42 inches.

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

Group Name: Conveyors #6 and #7

Emissions Unit ID:	F018
Company Equipment ID:	Conveyor #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F019
Company Equipment ID:	Conveyor #7
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 Cleveland Division of Air Quality 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 submitting¹ 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.

¹Permittees 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.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Conveyors #6 and #7: F018,F019,

EU ID	Operations, Property and/or Equipment Description
F018	Conveyor #6 is a bi-directional conveyor that can transport salt to two separate loading operations. In one direction, the conveyor feeds Conveyor #9 which transports salt to the bulk ship loading operations (F008). In the other direction Conveyor #6 feeds the #4 Truck Scale (F006).
F019	Conveyor #7 is a bi-directional belt conveyor that can transport salt to two separate loading locations. In one direction the conveyor feeds Conveyor #9, which transports salt to the bulk ship loading operations (F008). In the other direction, Conveyor #7 feeds the #7 Rail Scale (F007).

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)	Fugitive dust emissions (PM) from each emissions unit shall not exceed 1.89 lbs/hr and 4.18 tons per year (TPY). Fugitive particulate matter emissions less than 10 microns in diameter (PM ₁₀) from each emissions unit shall not exceed 0.69 lb/hr and 1.53 TPY. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart OOO and OAC rule

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		3745-17-08(B). See b)(2)c., and b)(2)d. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)e. below.
c.	OAC rule 3745-17-07(B)(1)	The opacity limitations specified by this rule are less stringent than the opacity limitations established pursuant to 40 CFR Part 60, Subpart OOO.
d.	OAC rule 3745-17-08(B)	See b)(2)b. below.
e.	40 CFR Part 60, Subpart OOO [In accordance with 40 CFR 60.670(a)(1), this emissions unit is a nonmetallic mineral processing plant subject to the emissions limitations/control measures specified in this section.]	See b)(2)a. below.

(2) Additional Terms and Conditions

- a. Fugitive emissions from the building openings (except for vents as defined in 40 CFR 60.671) must not exceed 7 percent opacity as a six-minute average.

The building that contains emissions units F018 and F019 currently does not have any vents (as defined in 40 CFR 60.671). If vents are installed in the building in the future, they must meet the applicable stack emission limits and compliance requirements in Table 2 of Subpart OOO.
- b. The permittee shall employ reasonably available control measures for the prevention of fugitive dust emissions from the operation of the belt conveyor and the transfer points totally enclosed in the buildings for the purpose of ensuring compliance with the above mentioned applicable requirements. Reasonably available control measures shall include but shall not be limited to not overloading the conveyor belt, keeping the drop heights at the transfer points to a minimum and maintaining the building enclosures in a condition conducive to the prevention of fugitive emissions. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The pound/hour and ton(s)/year emission limits have been established at potential to emit; therefore, monitoring, recordkeeping, and reporting are not needed for these limits.
- d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265

changes), such that BAT is no longer required by State regulations for NAAQS pollutant 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 3745-31-05, then these emission limits/control measures no longer apply.

- e. 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.

BAT does not apply since the uncontrolled potential to emit is less than ten tons per year for PM and PM₁₀.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is processing materials and when the weather conditions allow, for any visible emissions of fugitive dust (excluding uncombined water vapor) from the non-stack egress points (e.g., points of exit and entry of conveyor out of and into buildings, windows, doors, etc.) serving this emissions unit. The presence or absence of any visible fugitive dust emissions shall be recorded electronically or in an operations log. If visible emissions are observed, the permittee shall also record the following:

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

The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (Cleveland DAQ), modify the above-mentioned inspection frequency if operation experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality 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.

- (2) 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(1) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall also submit reports and such other notifications to the Cleveland DAQ as are required pursuant to 40 CFR part 60, Subpart OOO, per the following sections:

60.676(f)	submittal of written reports for all performance tests
60.676(h)	Subpart A requirement under 60.7(a)(1) is waived
60.676(j)	obligation to comply with the reporting requirements of this section
60.676(k)	where to send notifications

f) Testing Requirements

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

- a. Emission Limitation:
Fugitive PM emissions from each emissions unit shall not exceed 1.89 lbs/hour.

Applicable Compliance Method:

Compliance with the fugitive PM limitations shall be determined by using the emission factor in U.S. EPA's AP-42 manual, Table 11.19.2-2 (August 2004) and multiplying it by the given tons/hr maximum capacity of the given transfer point and multiplying it by the 70% retention factor in accordance with Ohio EPA, Division of Air Pollution Control's (previously Office of Air Pollution Control) 1980 RACM document as found in Section 2.1.3 and Table 2.29-2. Sum the emission rates from all transfer points to determine the total pounds per hour.

a = maximum capacity, ton/hr (depends on transfer point)

b = emission factor (0.003 lb PM/ton)

c = Retention Factor (0.70)

$(a \times 0.003 \text{ lbs/ton}) \times (1-0.70) = \text{lb/hr}$

Two transfer points for F018:

Conveyor #6 to Conveyor #9	a = 1,500 tons/hr
Conveyor #6 to Truck Scale	a = 600 tons/hr

Two transfer points for F019:

Conveyor #7 to Conveyor #9	a = 1,500 tons/hr
Conveyor #7 to Rail Scale	a = 600 tons/hr

b. Emission Limitation:

Fugitive PM emissions from each emissions unit shall not exceed 4.18 TPY

Applicable Compliance Method:

Compliance with the annual fugitive PM limitation shall be determined by using the emission factor in U.S. EPA's AP-42 manual, Table 11.19.2-2 (August 2004) and multiplying it by the tons/yr maximum annual capacity of the given transfer point and multiplying by the 70% retention factor in accordance with Ohio EPA, Division of Air Pollution Control's 1980 RACM document. Divide by 2000 lbs/ton. Sum the emission rates from all transfer points to determine the total tons PM per year.

a = maximum capacity, ton/yr (depends on transfer point)

b = emission factor (0.003 lb PM/ton)

c = Retention Factor (0.70)

$$(a \times 0.003 \text{ lbs/ton}) \times (1-0.70) / (2000 \text{ lb/ton}) = \text{tpy}$$

Two transfer points for F018:

Conveyor #6 to Conveyor #9	a = 4,038,000 tons/yr (limited by the mine hoisting/plant storage capacity)
Conveyor #6 to Truck Scale	a = 5,256,000 tons/yr (ton/hr x 8,760)

Two transfer points for F019:

Conveyor #7 to Conveyor #9	a = 4,038,000 tons/yr (limited by the mine hoisting/plant storage capacity)
Conveyor #7 to Rail Scale	a = 5,256,000 tons/yr (ton/hr x 8,760)

- c. Emission Limitation:
Fugitive PM₁₀ emission from each emissions unit shall not exceed 0.69 lb/hour

Applicable Compliance Method:

Compliance with the fugitive PM₁₀ limitations shall be determined by using the emission factor in U.S. EPA's AP-42 manual, Table 11.19.2-2 (August 2004) and multiplying it by the given tons/hr maximum capacity of the given transfer point and multiplying by the 70% retention factor in accordance with Ohio EPA, Division of Air Pollution Control's 1980 RACM document as found in Section 2.1.3 and Table 2.29-2.

a = maximum capacity, ton/hr (depends on transfer point)

b = emission factor (0.0011 lbs/ton)

c = Retention Factor (0.70)

$(a \times 0.0011 \text{ lbs/ton}) \times (1-0.70) = \text{lb/hr}$

See capacities for transfer points in f)(1)a. above.

- d. Emission Limitation:
Fugitive PM₁₀ emissions from each emissions unit shall not exceed 1.53 TPY

Applicable Compliance Method:

Compliance with the annual fugitive PM₁₀ limitations shall be determined by using the emission factor in U.S. EPA's AP-42 manual, Table 11.19.2-2 (August 2004) and multiplying it by the given tons/yr maximum annual capacity of the given transfer point and multiplying by the 70% retention factor in accordance with Ohio EPA, Division of Air Pollution Control's 1980 RACM document as found in Section 2.1.3 and Table 2.29-2. Divide by 2000 lbs/ton. Sum the emission rates for all transfer points to determine the total tons PM per year.

a = maximum capacity, ton/yr (depends on transfer point)

b = emission factor (0.0011 lbs/ton)

c = Retention Factor (0.70)

$(a \times 0.0011 \text{ lbs/ton}) \times (1-0.70) / (2000 \text{ lb/ton}) = \text{tpy}$

See capacities of transfer points in f)(1)b. above.

- e. Emission Limitation:
Fugitive emissions shall not exceed 7 percent opacity as a six-minute average from the building openings (except for vents as defined in §60.671).

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in f)(2) and f)(3) below.

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions 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 emissions testing shall be conducted to demonstrate compliance with the opacity limitation.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

U.S.EPA Method 9 of 40 CFR Part 60, Appendix A with any additional procedures required by 40 CFR Part 60, Subpart OOO.

- 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 Cleveland Division of Air Quality (CDAQ). 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 CDAQ. 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 CDAQ's refusal to accept the results of the emission test(s).
- f. Personnel from the CDAQ 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 CDAQ 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 CDAQ.

(3) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR Part 60, Subpart OOO, including the following sections:

60.675(a)	reference methods and procedures
60.675(b)(2)	Method 9 of Appendix A-4 of this part and the procedures in 60.11 shall be used to determine opacity
60.675(c)(1)	Method 9 of Appendix A-4 of this part shall be used and the procedures in 60.11 with the cited additions
60.675(c)(3)	the duration of the Method 9 observations must be 30 minutes and compliance must be based on the average of the five 6-minute averages
60.675(d)	test methods for initial performance tests for building construction, modification, or reconstruction on or after April 22, 2008
60.675(e)	Alternatives to the reference methods and procedures specified in this section
60.675(g)	Performance test notification deadlines
60.675(i)	Postponing initial tests due to seasonal shut down

g) Miscellaneous Requirements

(1) None.