



Environmental Protection Agency

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

7/24/2012

Mr. Lou Weichseldorfer  
THE PITTSBURGH & CONNEAUT DOCK CO  
950 Ford Avenue  
Conneaut, OH 44030

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0204020227  
Permit Number: P0107237  
Permit Type: Renewal  
County: Ashtabula

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	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 Ohio EPA DAPC, Northeast District Office at (330)425-9171 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: Ohio EPA-NEDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
THE PITTSBURGH & CONNEAUT DOCK CO**

Facility ID:	0204020227
Permit Number:	P0107237
Permit Type:	Renewal
Issued:	7/24/2012
Effective:	7/24/2012
Expiration:	7/24/2022





Division of Air Pollution Control
Permit-to-Install and Operate
for
THE PITTSBURGH & CONNEAUT DOCK CO

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## Authorization

Facility ID: 0204020227  
Application Number(s): A0040596, A0044964  
Permit Number: P0107237  
Permit Description: PTIO Renewal permit for coal handling and storage docks, iron ore handling and stone storage dock, coal storage area and roadways.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 7/24/2012  
Effective Date: 7/24/2012  
Expiration Date: 7/24/2022  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

THE PITTSBURGH & CONNEAUT DOCK CO  
950 FORD AVENUE  
Conneaut, OH 44030

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

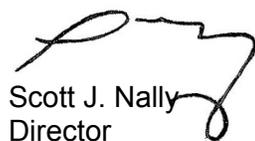
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

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: P0107237

Permit Description: PTIO Renewal permit for coal handling and storage docks, iron ore handling and stone storage dock, coal storage area and roadways.

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>F001</b>
Company Equipment ID:	Lower Dock #3 Coal Storage Area
Superseded Permit Number:	P0084205
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	Dock #4 Iron Ore and Stone Storage Area
Superseded Permit Number:	P0084206
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Upper Coal #3 Coal Storage Area
Superseded Permit Number:	P0084207
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F004</b>
Company Equipment ID:	Roadways
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F005</b>
Company Equipment ID:	Dock #1 Stone, Salt, and Other Storage Area
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 Ohio EPA DAPC, Northeast District Office 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.

## **C. Emissions Unit Terms and Conditions**



1. F001, Lower Dock #3 Coal Storage Area

Operations, Property and/or Equipment Description:

Stackers, Conveyors, Haul roads, Piles, Ship loaders, Silos, Thawing station, Railcar bottom dumping station, Track pit and Reclaimer. Inbound - railcars; Outbound - ships.

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 3745-17-07(B)	See b)(2)a below.
b.	OAC rule 3745-17-08	See b)(2)b below.
c.	OAC rule 3745-19-03(A)	See b)(2)c below.
d.	OAC rule 3745-15-07(A)	See b)(2)d below.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

- c. No person or property owner shall cause or allow open burning in a restricted area except as provided in paragraphs (B) to (D) of this rule or in section 3704.11 of the Revised Code.
  - d. The emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substances or combinations of substances, in such manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and declared to be a public nuisance. It shall be unlawful for any person to cause, permit or maintain any such public nuisance.
  - e. Any reference to 'western coal' in these terms and conditions is intended to include Powder River Basin (PRB) coals and other similar coals mined in the western United States.
- c) Operational Restrictions
- (1) The permittee shall take all reasonably available measures to immediately extinguish coal pile fires caused by spontaneous combustion within the storage pile. See Section G below.
  - (2) The permittee shall not cause, permit or maintain an air pollution public nuisance due to coal pile fires started by spontaneous combustion within the storage pile.
- d) Monitoring and/or Recordkeeping Requirements
- (1) Except as otherwise provided in this section, the permittee shall perform daily fire inspections of each western coal storage pile.
  - (2) The purpose of the inspections is to determine the need for implementing the fire control measures specified in this permit for each western coal storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
  - (3) The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
  - (4) The permittee shall keep a record of the date and time of each coal pile fire event, the measures taken to fight the fire and the duration of the fire.
  - (5) No inspection is required when no western coal is being stored on-site.

e) Reporting Requirements

- (1) 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.

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. None.

g) Miscellaneous Requirements

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



2. F002, Dock #4 Iron Ore Storage Area

Operations, Property and/or Equipment Description:

Reclaimers, Conveyors, Haul roads, Piles, Stationary hopper, Railcar loader and Stacker. Inbound - Ships; Outbound - railcars.

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 3745-17-07(B)	See b)(2)a below.
b.	OAC rule 3745-17-08	See b)(2)b below.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) None.
- e) Reporting Requirements
  - (1) None.
- 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. None.
- g) Miscellaneous Requirements
  - (1) None.



3. F003, Upper Dock #3 Coal Storage Area

Operations, Property and/or Equipment Description:

Stacker, Conveyors, Haul roads, Piles, Thawing station, Rotary railcar dumper and Reclaimer. Inbound - railcars; Outbound - ships.

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 3745-17-07(B)	See b)(2)a below.
b.	OAC rule 3745-17-08	See b)(2)b below.
c.	OAC rule 3745-19-03(A)	See b)(2)c below.
d.	OAC rule 3745-15-07(A)	See b)(2)d below.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

- c. No person or property owner shall cause or allow open burning in a restricted area except as provided in paragraphs (B) to (D) of this rule or in section 3704.11 of the Revised Code.
  - d. The emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substances or combinations of substances, in such manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and declared to be a public nuisance. It shall be unlawful for any person to cause, permit or maintain any such public nuisance.
  - e. Any reference to 'western coal' in these terms and conditions is intended to include Powder River Basin (PRB) coals and other similar coals mined in the western United States.
- c) Operational Restrictions
- (1) The permittee shall take all reasonably available measures to immediately extinguish coal pile fires caused by spontaneous combustion within the storage pile. See Section G below.
  - (2) The permittee shall not cause, permit or maintain an air pollution public nuisance due to coal pile fires started by spontaneous combustion within the storage pile.
- d) Monitoring and/or Recordkeeping Requirements
- (1) Except as otherwise provided in this section, the permittee shall perform daily fire inspections of each western coal storage pile.
  - (2) The purpose of the inspections is to determine the need for implementing the fire control measures specified in this permit for each western coal storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
  - (3) The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
  - (4) The permittee shall keep a record of the date and time of each coal pile fire event, the measures taken to fight the fire and the duration of the fire.
  - (5) No inspection is required when no western coal is being stored on-site.

e) Reporting Requirements

- (1) 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.

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. None.

g) Miscellaneous Requirements

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



4. F004, Plantwide roadways

Operations, Property and/or Equipment Description:

Roadways

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.

Table with 3 columns: Index, Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-17-07(B), See b)(2)a below. Row b: OAC rule 3745-17-08, See b)(2)b below.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

(1) None.

- d) Monitoring and/or Recordkeeping Requirements
  - (1) None.
- e) Reporting Requirements
  - (1) None.
- 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. None.
- g) Miscellaneous Requirements
  - (1) None.



5. F005, Dock #1 Stone, Salt, and Other Storage Area

Operations, Property and/or Equipment Description:

Front end loaders and self-unloading vessels. Inbound - self unloading ships; outbound - railcars or trucks

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 3745-17-07(B)	See b)(2)a below.
b.	OAC rule 3745-17-08	See b)(2)b below.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) None.
- e) Reporting Requirements
  - (1) None.
- 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. None.
- g) Miscellaneous Requirements
  - (1) None.