



Environmental Protection Agency

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

8/28/2012

William Wagner  
SANDUSKY DOCK CORP  
1200 Peachtree St  
Box 13  
Atlanta, GA 30309

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0322020259  
Permit Number: P0086988  
Permit Type: Renewal  
County: Erie

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, Northwest District Office at (419)352-8461 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-NWDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
SANDUSKY DOCK CORP**

Facility ID:	0322020259
Permit Number:	P0086988
Permit Type:	Renewal
Issued:	8/28/2012
Effective:	8/28/2012
Expiration:	8/28/2022





Division of Air Pollution Control
Permit-to-Install and Operate
for
SANDUSKY DOCK CORP

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## Authorization

Facility ID: 0322020259  
Application Number(s): A0017871  
Permit Number: P0086988  
Permit Description: PTIO Renewal for roadways, coal storage piles and material handling operations.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 8/28/2012  
Effective Date: 8/28/2012  
Expiration Date: 8/28/2022  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SANDUSKY DOCK CORP  
2705 W MONROE ST  
SANDUSKY, OH 44870

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

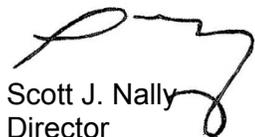
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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: P0086988  
Permit Description: PTIO Renewal for roadways, coal storage piles and material handling operations.

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:	Roadways/Parking Areas
Superseded Permit Number:	P0086986
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	Material Storage Piles(Coal)
Superseded Permit Number:	P0086987
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Material Handling
Superseded Permit Number:	P0086986
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, Northwest 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, Roadways/Parking Areas

Operations, Property and/or Equipment Description:

Paved and unpaved roads and parking areas

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 operations, 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. 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 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-31-05(F), See b)(2)a. through b)(2)e.

(2) Additional Terms and Conditions

a. 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). In addition, 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. The permittee shall treat the paved and unpaved roads and parking areas at the facility in accordance with the following program to minimize or eliminate emissions of fugitive dust into the ambient air at all times:

- i. The permittee shall apply water and/or chemical stabilization/dust suppressants to paved and unpaved roads and parking areas on an as-needed basis to minimize or eliminate emissions of fugitive dust.
  - ii. The frequencies of implementation of the control measure shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measure shall not be necessary for roads and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate emissions of fugitive dust. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use. Where a control measure would be required but is suspended, the permittee shall document when and where the control measure was suspended and the specific conditions that caused its suspension.
  - iii. Nothing in this paragraph shall prohibit the permittee from employing additional control measures to minimize or eliminate emissions of fugitive dust from the roads and parking areas.
- c. Coal spills on the roadways and parking areas shall be promptly cleaned up. The permittee shall take reasonable precautions to ensure that trucks leaving the facility will not have pockets of coal or residual amounts of coal on platforms, ledges, etc., of trucks that might be deposited on public roadways.
  - d. The permittee shall ensure that any open-bodied coal trucks or trailers using the public streets are covered when loaded and in motion at the facility (except open-bodied vehicles that do not normally leave the facility or that are empty and being loaded). Any open-bodied coal trucks or trailers that are transporting coal from the permittee's facility shall be tarped before departure from the facility to prevent fugitive dust emissions when loaded and in motion at the facility (except open-bodied vehicles that do not normally leave the facility or that are empty and being loaded).
  - e. A maximum speed limit of 25 miles per hour on all paved roads shall be posted and enforced on the property. A maximum speed limit of 10 miles per hour on all unpaved roads shall be posted and enforced on the property.
- 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 the paved and unpaved roads and parking areas on a daily basis when the facility is in operation, or more frequently if necessary to minimize or eliminate emissions of fugitive dust.
    - (2) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for the paved and unpaved roads and parking areas.

The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended.

- (3) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- (4) The above records shall be retained by the permittee for five (5) years and shall be made available to the Director or his representative upon request.
- 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) None.
- g) Miscellaneous Requirements
- (1) None.



2. F002, Material Storage Piles(Coal)

Operations, Property and/or Equipment Description:

Coal Storage Piles

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 operations, 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. 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(F)	See b)(2)a. through b)(2)f.

(2) Additional Terms and Conditions

a. 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). In addition, 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. The permittee shall minimize or eliminate emissions of fugitive dust from the coal storage piles at all times.

c. The permittee shall apply water and/or chemical stabilization/dust suppressants to the coal storage piles on an as-needed basis to minimize or eliminate emissions

of fugitive dust. The permittee shall continue to utilize the existing water spray system, as delivered by either water cannon system (whether or not automated) or truck mounted sprays, on an as-needed basis, to minimize or eliminate emissions of fugitive dust. The fixed water tower spray system, water tank truck(s) and/or other watering measures shall be operated and maintained so that water is applied evenly and distributed over the full height of the coal storage piles, except to the extent not technically feasible during storm conditions, in a manner that complies with the applicable emission limitations.

The permittee shall not be required to employ water and/or chemical stabilization/dust suppressants for the storage piles on days when ambient temperatures or conditions render the control measure technically infeasible. During such periods the permittee shall make reasonable efforts to minimize or eliminate emissions of fugitive dust from the storage piles.

- d. Within two (2) months after the effective date of this permit to install and operate, the permittee shall complete installation of an automated software system to monitor and control the amount and frequency of watering from the existing water spray towers, including a real-time aerosol monitor. In the event of a delay in such installation due to weather conditions, the two (2)-month period shall be suspended to coincide with the weather delay, and the timeline will resume at the conclusion of such weather delay. The automated software system shall control the watering of the storage piles based upon site-specific weather conditions using an on-site weather station and/or equivalent. Any equivalent shall have written approval of Ohio EPA. Outages due to malfunction or scheduled maintenance of the automated software system shall not be considered noncompliance with this permit so long as the permittee is in compliance with applicable emissions limitations, but shall be reported to Ohio EPA, when required by and in accordance with OAC rule 3745-15-06.
  - e. For any coal storage pile that will remain inactive for more than 2 months, the permittee shall apply a chemical dust suppressant (crusting agent) over the surface of the pile to minimize or eliminate emissions of fugitive dust from the pile.
  - f. The permittee shall maintain as low a pile height as feasible such that the storage piles can be reached by the sprays from the water spray towers and/or spray truck(s).
- 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 all the coal storage piles comprising this emissions unit on a daily basis, or more frequently if necessary to minimize or eliminate emissions of fugitive dust.

- (2) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for the coal storage piles. The inspections shall be performed during representative, normal coal storage conditions. No inspection shall be necessary for a coal 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. 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.
- (3) The permittee shall maintain records of the following information:
- 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;
  - the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - the dates the control measures were implemented; and
  - on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- (4) The permittee also shall maintain records of the following information:
- The total volume of water sprayed on the coal storage piles each day when the automated software system is used for the spray towers and/or when the water truck is used. (The spray towers do not have flow meters absent the automated software system.)
  - The date a crusting agent was applied to coal storage pile surfaces and an identification of the coal storage pile that was sprayed.
  - An identification of each calendar day any water spray tower was not operating properly and did not minimize or eliminate emissions of fugitive dust. Improper operation of a water spray tower shall be reported to Ohio EPA when required by and in accordance with OAC rule 3745-15-06.
  - The dates and durations when wet suppression was not employed to control the emissions of fugitive dust due to extremely low ambient temperatures. These records shall identify the ambient temperature, and corresponding time, that led to the conclusion to not employ wet suppression. In addition, the permittee shall maintain sufficient records of its efforts to minimize or eliminate emissions of fugitive dust with alternative control measures during such periods.

- (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) None.
  
- g) Miscellaneous Requirements
  - (1) None.



3. F003, Material Handling

Operations, Property and/or Equipment Description:

Material Handling Operations

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 operations, 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. 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(F)	See b)(2)a. through b)(2)b.

(2) Additional Terms and Conditions

a. 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). In addition, 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. The permittee shall employ the following control measures for the material handling operations to minimize or eliminate emissions of fugitive dust from the operations at all times:

- i. The permittee shall continue to maintain the full or partial enclosures (which may include wind guards or lowering booms) that are in place at the following transfer points:
1. Conveyor #1 to conveyor #2 transfer hopper
  2. Conveyor #2 to conveyor #6 transfer hopper
  3. Conveyor #6 to conveyor #3 transfer hopper
  4. Conveyor #3 to conveyor #4 transfer hopper
  5. Conveyor #4 to tripper cross conveyor transfer hopper
  6. Bandwagon discharge conveyor to tripper receivinghopper
  7. Tripper reclaim hopper to conveyor #4 transfer
  8. Conveyor #4 to conveyor #5 transfer hopper
  9. Conveyor #5 to surge silos transfer
  10. Silo discharges to conveyor #6 transfer hopper
  11. Conveyor #6 to conveyor #7 transfer hopper
  12. Conveyor #7 to conveyor #8 transfer hopper
  13. Conveyor #8 to pan/telescope
  14. Bandwagon discharge conveyor at load-in to storagepile
  15. Bucket wheel reclaimer to bucket reclaimer dischargeconveyor
- ii. Within four (4) months after the effective date of this permit toinstall and operate, the permittee shall install a hood on the reclaim wheel discharge boom anda hood on the cross-conveyor in order to minimize or eliminate emissions of fugitive dust from this equipment.In the event of a delay in such installation due to weather conditions, the four (4)-month period shall be suspended to coincide with the weather delay, and the timeline will resume at the conclusion of such weather delay. Once installed, the permittee shall maintain these enclosures as in 3.b).(2).b.i. above.
- In addition, within four (4) months after the effective date of this permit to install and operate, the permittee shall complete an engineering study and submit a report to the Ohio EPA that summarizes the results of the study to determine the technical feasibility and economic reasonableness of installing a wind barrier around the car dumper.
- If the study determines that the windbarrier is technically feasible and economicallyreasonable, the permittee shall install such technically feasibleand economically reasonable control measure within four (4) months after the Ohio EPA's receipt of the report, weatherpermitting. In the event of a delay in such installation due to weather conditions, the four (4)-month period shall be suspended to coincide with the weather delay, and the timeline will resume at the conclusion of such weather delay.
- iii. The permittee shall apply water and/or chemical stabilization/dustsuppressants (where available) to the coal by employing the spraysystems inplace on the conveyance system, on an as-needed basis. The water and/or chemical stabilization/dust suppressants shall be applied in a manner that will minimize or eliminate emissions of fugitive dust from downstream coal transfer points.

For each material handling operation that is not fully enclosed, the above-mentioned spray systems and/or use of a watering truck where feasible shall be implemented if the permittee determines, as a result of the inspections conducted pursuant to the monitoring section of this permit, that the control measure is necessary to minimize or eliminate emissions of fugitive dust from the material handling operations. Any required implementation of the control measure shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure is unnecessary.

The permittee shall not be required to employ water and/or chemical stabilization/dust suppressants for the material handling operations on days when ambient temperatures or conditions render the control measure technically infeasible. During such periods the permittee shall make all reasonable efforts to minimize or eliminate emissions of fugitive dust during the material handling operations as operationally feasible.

- iv. The permittee shall lower the pan chutes as much as operationally feasible during the transfer of coal to minimize the drop height of the coal being transferred at the following locations:
  - 1. Pan/telescope chute discharge to conveyor #1 transfer hopper;
  - 2. Bandwagon to hopper for conveyor 4; and
  - 3. Pan/telescope chute discharge to ship cargo hold load-out.

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 the material handling equipment on a daily basis when in operation, or more frequently if necessary to minimize or eliminate emissions of fugitive dust.
- (2) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for the material handling equipment. The inspections shall be performed during representative, normal material handling operations. No inspection shall be necessary for material handling operations that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. 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.
- (3) The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

The permittee shall maintain records of the dates and durations when wet suppression was not employed to control the emissions of fugitive dust due to extremely low ambient temperatures. These records shall identify the ambient temperature, and corresponding time, that led to the conclusion to not employ wet suppression. In addition, the permittee shall maintain sufficient records of its efforts to minimize or eliminate emissions of fugitive dust with alternative control measures during such periods.

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) None.

g) Miscellaneous Requirements

- (1) None.