

Facility ID: 0322020259 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0322020259 Emissions Unit ID: F002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
load-in and load-out of storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-17-07 (B)(6)	no visible emissions except for 13 minutes in any hour
	OAC rule 3745-17-08 (B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c and A.2.f)
wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-17-07 (B)(6)	no visible emissions except for 13 minutes in any hour
	OAC rule 3745-17-08 (B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.f)

2. Additional Terms and Conditions

- (a) The storage piles that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

coal storage piles - at any time, there are 1 to 15 separate storage piles at the facility. The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ a variable height stacker/reclaimer which is fitted with a fabric wind guard at the discharge end of the conveyor to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. The above-mentioned control measure shall be employed at all times for each load-in and load-out operation of each storage pile.

The permittee shall employ reasonably available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the visible emission limitation contained in OAC rule 3745-17-07(B) (see section A.1 of this permit). In accordance with the permittee's permit application, the permittee has committed to the following control measures in order to ensure compliance:

- i. utilize the automated water spray control system and the truck-mounted water spray system on the surface of the storage piles;
- ii. apply a surface crusting agent to the surface of inactive storage piles;
- iii. maintain the maximum height of each storage pile at not more than 70 feet; and
- iv. compact the storage piles, as needed.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. All control measures shall be implemented on an as-needed basis to ensure that compliance is maintained with the "applicable emission limitations/control measures" (see Section A.1 of this permit).

The above-mentioned control measures shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this

permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

Based on the number of complaints that have been filed with the Northwest District Office (NWDO), including one verified complaint filed with the Director's office that contained 99 signatures, and the observations of NWDO staff, it has been determined that there has been probable cause to believe that the fugitive dust emissions from the coal storage piles have caused a violation of OAC rule 3745-15-07 - Air Pollution Nuisances Prohibited. As a result, in accordance with OAC rule 3745-17-08(A)(2), the visible emission limitations and control requirements established in OAC rules 3745-17-08(A) and 3745-17-07(B) are applicable. The proper implementation of the above-mentioned control measures should prevent any further violations of OAC rule 3745-15-07.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

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

storage pile identification: all

minimum wind erosion inspection frequency: daily for each pile

2. No inspection shall be necessary for wind erosion or any storage pile activity when the pile is covered with snow and/or ice or if rain, wind and temperature conditions are such that dust emissions from coal piles or from storage pile activities will not occur. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as any such event has ended.

3. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for wind erosion from the surface of a storage pile.

4. The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection for wind erosion where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures for wind erosion were implemented;

d. the dates the control measure for load-in and load-out of each pile was not implemented; and

e. on a calendar quarter basis, the total number of days the control measures for wind erosion were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures for wind erosion.

The information required in 7.d. and 7.e. shall be kept separately for (i) the load-in and load-out operations and (ii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall maintain a log of the downtime of the automated spray system. The log shall include the date (s) and time(s) of each incident, a description of the alternative control measure employed, and the wind direction(s) and speed(s) during the downtime.

6. During periods of downtime, the permittee shall employ the truck-mounted water spray canon to suppress the dust. The permittee shall maintain the following records during such periods:

a. the date(s) and time(s) that the truck-mounted water spray canon was employed to suppress dust from the material storage pile surfaces; and

b. the portions of the material storage piles that were treated with the truck-mounted water spray canon.

7. The permittee shall maintain a log of the following information for the application of the surface crusting agent:

a. the date(s) and amounts of crusting agents (e.g., Chemsolv or equivalent) applied to the material storage pile surfaces;

b. the portions of the material storage piles that were treated with the surface crusting agents;

c. the identification (i.e., brand name) of the surface crusting agent applied;

d. the dilution rate of the surface crusting agent, with water; and

e. the application rate of the surface crusting agent, in gallons (undiluted and diluted).

D. Reporting Requirements

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

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

b. each instance when the control measures, that were to be implemented as a result of an inspection, were not

implemented; and

c. each day when the control measure for the load-in and load-out operations was not implemented.

2. The reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

1. None