



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
LUCAS COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

**Application No: 04-01422
Fac ID: 0448010339**

DATE: 9/27/2005

Midwest Terminal of Toledo
Doug Struble
387 W. Dussel Rd.
Maumee, OH 43537

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$3750** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

TDES

Toledo Metropolitan Area Council of Governments

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LUCAS COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **04-01422** FOR AN AIR CONTAMINANT SOURCE FOR
Midwest Terminal of Toledo

On 9/27/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Midwest Terminal of Toledo**, located at **3319 St Lawrence Dr, Toledo, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 04-01422:

Terminal operations for coal, coke and iron ore.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Karen Granata, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43602
[(419)936-3015]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 04-01422

Application Number: 04-01422
Facility ID: 0448010339
Permit Fee: **To be entered upon final issuance**
Name of Facility: Midwest Terminal of Toledo
Person to Contact: Doug Struble
Address: 387 W. Dussel Rd.
Maumee, OH 43537

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3319 St Lawrence Dr
Toledo, Ohio**

Description of proposed emissions unit(s):
Terminal operations for coal, coke and iron ore.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Midwest Terminal of Toledo
PTI Application: 04-01422
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0448010339

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.8 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the

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permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones,

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or compliance were achieved.

- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or

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"modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of

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the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install.

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The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

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PTI A

Emissions Unit ID: **F004**

Issued: To be entered upon final issuance

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	3.22
PM10	1.42

Midwest Terminal of Toledo
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Issue:

Facility ID: 0448010339

Emissions Unit ID: F004

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

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PTI A

Emissions Unit ID: **F004**

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
F004 - coke storage piles, including load-in and load-out operations with partial enclosure	OAC rule 3745-31-05(A)(3)	0.3 ton per year of particulate emissions (PE), and see Sections A.2.a. and b.
	OAC rules 3745-31-10 thru 20	See Section A.2.c.
load-in and load-out of storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	No visible emissions except for one minute in any hour, and see Sections A.1.2.d., A.1.2.e. and A.1.2.h.
	OAC rule 3745-17-07(B)(6)	Less stringent than the above-mentioned control measure requirements.
wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	No visible emissions except for three minutes in any hour, and see Sections A.1.2.f. through A.1.2.h.
	OAC rule 3745-17-08(B), (B)(6)	Less stringent than the above-mentioned control measure requirements.

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PTI A

Emissions Unit ID: **F004**

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2. Additional Terms and Conditions

- 2.a** All coke storage piles at this facility are covered by this permit and subject to the above-mentioned requirements.

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- 2.b** The annual emission limitation was established for PTI purposes to reflect the potential to emit for the storage piles. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.c** The combined emissions from all sources comprising this emissions until shall not exceed 0.19 ton of PM₁₀ as a rolling, 12-month summation
- 2.d** The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to installing a partial enclosure and watering to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- 2.f** The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to watering and applying chemical dust suppressant to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.g** The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

- 2.h 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 rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
coke piles	daily

2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
coke piles	daily

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

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
coke piles	daily

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one

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week.

5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, 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.
7. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

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

D. Reporting Requirements

1. The permittee shall submit written quarterly deviation reports to the Toledo Division of Environmental Services in accordance with the reporting requirements of the General Terms and Conditions of this permit. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the quarter. These reports are due by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

0.19 ton of PM₁₀ as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of the following:

- i. coke pile load-in

Multiply the maximum tons of coke handled per year (1,440,000 made enforceable by FDS Coke permit B901) times the 0.00034 pound/ton PM₁₀ emission factor times 0.15 (assuming a 85% control efficiency for partial enclosure and wetting) and divide by 2,000 pounds per ton = 0.037 ton/yr. The PM₁₀ emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was supplied by the permittee.

- ii. coke pile wind erosion

Multiply the maximum tons of coke stored on the ground (15,000) times the 0.03430 pound/ton particulate emission factor times 0.30 (assuming a 70% control efficiency for the wetting) and divide by 2,000 pounds per ton = 0.077 ton/yr. The PM₁₀ emission factor was calculated in accordance with Kentucky's Department of Environmental Protection Study and the control efficiency was obtained from RACM, Table 2.2.1-2, dated 1/80.

- iii. coke pile load-out

Multiply the maximum tons of coke handled in each of the operations below (1,440,000 made enforceable by B901) times one minus the PM₁₀ emission factor in pounds/ton times the listed control efficiency, and divide by 2,000 pounds per ton. The PM₁₀ emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1,

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PTI A

Emissions Unit ID: **F004**

Issued: To be entered upon final issuance

dated 1/95. The control efficiency (85%) was supplied by the permittee.
For the following:

coke pile to front end loader with partial enclosure and wetting:

$$1,440,000 \cdot .00034 \cdot (1 - 0.85) / 2000 = 0.037$$

front end loader to conveyor with partial enclosure and wetting:

$$1,440,000 \cdot .00034 \cdot (1 - 0.85) / 2000 = 0.037$$

b. Emission Limitation:

0.3 ton per year of PE

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of the following:

i. coke pile load-in

Multiply the maximum tons of coke handled per year (1,440,000 made enforceable by B901) times the 0.00073 pound/ton particulate emission factor times 0.15 assuming a 85% control efficiency for partial enclosure and wetting and divide by 2,000 pounds per ton = 0.079 ton/yr. The particulate emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was supplied by the permittee.

ii. coke pile wind erosion

Multiply the maximum tons of coke stored on the ground (15,000) times the 0.03430 pound/ton particulate emission factor times 0.30 assuming a 70% control efficiency for the wetting and divide by 2,000 pounds per ton. The particulate emission factor was calculated in accordance with Kentucky's Department of Environmental Protection Study and the control efficiency was obtained from RACM, Table 2.2.1-2, dated 1/80.

iii. coke pile load-out

Multiply the maximum tons of coke handled in each of the operations below (1,440,000 made enforceable by B901) times the emission factor in pounds/ton times one minus the listed control efficiency, and divide by 2,000 pounds per ton. The particulate emission factor calculated from AP-

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42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was obtained from RACM, Table 2.2.1-2, dated 10/80. For the following:

coke pile to front end loader with partial enclosure and wetting:

$$1,440,000 \cdot .00073 \cdot (1-0.85) / 2000 = 0.079$$

front end loader to conveyor with partial enclosure and wetting:

$$1,440,000 \cdot .00073 \cdot (1-0.85) / 2000 = 0.079$$

c. Emission Limitation:

There shall be no visible emissions except for one minute in any hour.

Applicable Compliance Method:

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.

d. Emission Limitation:

There shall be no visible emissions except for three minutes in any hour.

Applicable Compliance Method:

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.

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2. Emission Testing Requirements:

The permittee shall conduct, or have conducted, emission testing for all emissions sources comprising this emissions unit in accordance with the following requirements.

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Toledo Division of Environmental Services.
- b. The emission testing shall be conducted to demonstrate compliance with the visible emission limitations from all fugitive sources .
- c. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
 - i. opacity: Method 22 of 40 CFR part 60, appendix A :

The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services (TDOES). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operation parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the TDOES's refusal to accept the results of the emission tests.

Personnel from the TDOES shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions unit and /or the performance of the control equipment. A comprehensive written report on the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the TDOES within 30 days following completion of the tests.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>		building
F005 - coal unloading and handling: railcar dumper with below grade hopper and vibratory feeder to dumper collecting conveyor, controlled by full enclosure and maintaining moisture levels	coal conveying operations controlled by enclosure and maintaining adequate moisture levels	coal storage piles, including load-in and load-out with full enclosure and emissions controlled by a cyclone vented inside the building
roller screen crusher with full enclosure and below ground level	coal crushing and screening operation with transfer controlled by full enclosure with a cyclone vented inside the	coal stamping with full enclosure

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vented to a baghouse

Applicable Rules/Requirements

OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07 (B)(1)

OAC rule 3745-17-08 (B)

OAC rule 3745-31-10 thru 20

OAC rule 3745-17-07 (B)(1)

OAC rule 3745-17-08 (B)

40 CFR Part 60, Subpart Y

OAC rule 3745-31-10 thru 20

OAC rule 3745-31-05(A)(3)

40 CFR Part 60, Subpart Y

coal blending unit with full enclosure and cyclone vented inside

OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07 (B)(1)

OAC rule 3745-17-08 (B)

OAC rule 3745-31-10 thru 20

OAC rule 3745-17-07 (B)(1)

OAC rule 3745-17-08 (B)

40 CFR Part 60, Subpart Y

OAC rule 3745-31-10 thru 20

OAC rule 3745-31-05(A)(3)

40 CFR Part 60, Subpart Y

OAC rule 3745-31-05(A)(3)

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		<u>Applicable Emissions Limitations/Control Measures</u>
OAC rule 3745-17-07(B)(1)	OAC rule 3745-17-07 (B)(1)	
OAC rule 3745-17-08(B)	OAC rule 3745-17-08 (B)	
OAC rule 3745-31-10 thru 20	OAC rule 3745-31-10 thru 20	0.28 pound of particulate emissions (PE) per hour, 0.62 ton of PE per year, 0.14 pound of particulate matter less than 10 micron (PM ₁₀) per hour, and see section A.I.2.a and 2.b
40 CFR Part 60, Subpart Y	40 CFR Part 60, Subpart Y	
OAC rule 3745-31-05(A)(3)		See section A.I.2.c.
		See section A.I.2.d.
		0.3 ton of PM ₁₀ as a rolling, 12-month summation.
		See section A.I.2.c.
OAC rule 3745-17-07 (A)(1)		
OAC rule 3745-17-07(B)(1)		0.2 pound of particulate emissions (PE) per hour,
OAC rule 3745-17-08 (B)		0.4 ton of PE per year,
OAC rule 3745-17-11		0.08 pound of particulate matter less than 10 micron (PM ₁₀) per hour, and see section A.I.2.a, 2.b and 2.d.
OAC rule 3745-31-10 thru 20		
40 CFR Part 60, Subpart Y		See section A.I.2.c.
		See section A.I.2.c.
OAC rule 3745-31-05(A)(3)		0.2 ton of PM ₁₀ as a rolling, 12-month summation.
		See section A.I.2.c.
		0.5 pound per hour of particulate

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<p>emissions (PE) per hour, 0.6 ton of PE per year, 0.2 pound per hour of particulate matter less than 10 micron (PM₁₀) per hour, and see section A.I.2.a, 2.b. and 2.d.</p>		<p>per year PE as a rolling 12-month summation; 0.01 ton of PM₁₀ as a rolling, 12- month summation. See section A.I.2.c.</p>
<p>See section A.I.2.c.</p>	<p>0.014 pound per hour PM₁₀; and See section A.I.2.b, 2.d, 2.e, and 2.g.</p>	<p>0.05 pound per hour of particulate emissions (PE) per hour, 0.05 ton of PE per year, 0.02 pound per hour of particulate matter less than 10 micron (PM₁₀) per hour, and see section A.I.2.b, 2.d, 2.e., and 2.g.</p>
<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>
<p>0.3 ton of PM₁₀ as a rolling, 12- month summation.</p>	<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>
<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>
<p>0.45 pound per hour of particulate emissions (PE) per hour, 0.46 ton of PE per year, 0.14 pound per hour of particulate matter less than 10 micron (PM₁₀) per hour, and see sections A.I.2.b, 2.d., 2.e., and 2.g</p>	<p>0.026 ton of PM₁₀ as a rolling, 12-month summation. See section A.I.2.c.</p>	<p>See section A.I.2.c.</p> <p>0.02 ton of PM₁₀ as a rolling, 12- month summation. See section A.I.2.c.</p>
<p>See section A.I.2.c.</p>	<p>0.02 pound per hour of particulate emissions (PE) per hour, 0.02 ton of PE per year, 0.01 pound per hour of particulate matter less than 10 micron (PM₁₀) per hour, and see section A.I.2.b., 2.d, 2.e., and 2.f.</p>	<p>See section A.I.2.c.</p>
<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>
<p>0.15 ton of PM₁₀ as a rolling, 12- month summation.</p>	<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>
<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>
<p>0.024 pound per hour and 0.035 ton</p>	<p>See section A.I.2.c.</p>	<p>See section A.I.2.c.</p>

2. Additional Terms and Conditions

- 2.a** The visible emissions of fugitive dust from all equipment comprising in this emissions unit shall not exceed 10% opacity as a 3-minute average.
- 2.b** The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-31-10 thru 20 and OAC rule 3745-17-08(b).
- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d**
- i. The permittee shall employ best available control measures for all coal handling operations for the purpose of ensuring compliance with the emissions limitations above. These control measures shall include, but not be limited to, the addition of moisture, the enclosure of the emissions sources and the addition of dust control systems.
 - ii. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.e** There shall be no visible emissions of fugitive dust from any egress in any building (i.e., tower) enclosing any process of this emissions unit which is served by a dust collector (e.g., baghouse or cyclone).
- 2.f** Visible emissions particulate shall not exceed 5 percent opacity, as a 6-minute average, from any dust collector (e.g., baghouse) stack serving this emissions unit.
- 2.g** The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

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13 transfer points fully enclosed and inside
2 fully enclosed storage hoppers
coal crushing, sizing, and blending equipment
all coal storage piles, including load-in and load-out
coal stamping unit
coal blending unit

B. Operational Restrictions

1. The permittee shall operate the cyclone whenever the coal crushing operation is in use.
2. The permittee shall operate the baghouse whenever the coal stamping operation is in use.
3. The permittee shall operate the cyclone whenever the coal blending unit is in use.
4. The permittee shall operate the cyclone during storage pile load-in and load-out operations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the cyclone was not in service when the coal crushing operation was in use.
2. The permittee shall maintain daily records that document any time periods when the baghouse was not in service when the coal stamping operation was in use.
3. The permittee shall maintain daily records that document any time periods when the cyclone was not in service when the coal blending unit was in use.
4. The permittee shall maintain daily records that document any time periods when the cyclone was not in service during coal storage pile load-in and load-out.
5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the listed equipment comprising this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;

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- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, 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.

- 6. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving the coal stamping unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

- 1. The permittee shall submit written quarterly deviation reports to the Toledo Division of Environmental Services which identify all days during which the cyclone was not in service when the coal crushing operation was in use. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the quarter. These reports are due by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
- 2. The permittee shall submit written quarterly deviation reports to the Toledo Division of Environmental Services which identify all days during which the baghouse was not in service when the coal stamping operation was in use. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the quarter. These reports are due by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
- 3. The permittee shall submit written quarterly deviation reports to the Toledo Division of

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Environmental Services which identify all days during which the cyclone was not in service when coal blending unit was in use. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the quarter. These reports are due by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

4. The permittee shall submit written quarterly deviation reports to the Toledo Division of Environmental Services which identify all days during which the cyclone was not in service during storage pile coal load-in and load-out. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the quarter. These reports are due by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
5. The permittee shall submit written quarterly deviation reports to the Toledo Division of Environmental Services which (a) identify all days during which any visible fugitive particulate emissions were observed from the equipment comprising this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the quarter. These reports are due by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
6. The permittee shall submit quarterly written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving the coal stamping unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emission limitation(s) for the railcar dumper hopper, vibratory feeder and dumper collecting conveyor in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

0.28 pound per hour of particulate matter (PE).

Applicable Compliance Method:

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Compliance shall be demonstrated by the following calculation: multiply the maximum tons of coal unloaded per hour (2000), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation) times (1- % control efficiency). The control efficiencies were supplied by the applicant as follows: fully enclosed 85% , fully enclosed and inside 95% for:

1 fully enclosed transfer point
 2 fully enclosed and inside transfer points

$$2000*(0.00056*(1-0.85) + 0.00056*2*(1-0.95)) = 0.28 \text{ lb/hr}$$

b. Emission Limitation:

0.62 ton of PE per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum tons of coal unloaded per rolling 12-month period (8,760,000), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation) times (1- % control efficiency), and divide by 2,000 pounds per ton. The control efficiencies were supplied by the applicant as follows: fully enclosed 85% , fully enclosed and inside 95% for:

1 fully enclosed transfer point
 2 fully enclosed and inside transfer points

$$8,760,000*(0.00056*(1-0.85) + 0.00056*2*(1-0.95))/ (2000 \text{ lb/ton}) = 0.62 \text{ ton/yr}$$

c. Emission Limitation:

0.14 pound per hour of particulate matter less than 10 micron (PM₁₀)

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum tons of coal unloaded per hour (2000), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation) times (1- % control efficiency). The

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control efficiencies were supplied by the applicant as follows: fully enclosed 85% , fully enclosed and inside 95% for:

1 fully enclosed transfer point
2 fully enclosed and inside transfer points

$$2000*(0.00027*(1-0.85) + 0.00027*2*(1-0.95)) = 0.14 \text{ lb/hr}$$

d. Emission Limitation:

0.3 ton of PM₁₀ as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum tons of coal unloaded per rolling 12-month period (8,760,000), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation) times (1- % control efficiency), and divide by 2,000 pounds per ton. The control efficiencies were supplied by the applicant as follows: fully enclosed 85% , fully enclosed and inside 95%; fully enclosed hopper 99% for:

1 fully enclosed transfer point
2 fully enclosed and inside transfer points

$$8,760,000*(0.00027*(1-0.85) + 0.00027*2*(1-0.95))/ (2000 \text{ lb/ton}) = 0.3 \text{ ton/yr}$$

2. Compliance with the emission limitation(s) for the coal conveying operations in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

0.5 pound per hour of particulate matter (PE).

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum equipment capacity (tons of coal per hour), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation) times (1- % control

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efficiency). The control efficiencies were supplied by the applicant as follows:
fully enclosed and inside 95% for:

4 fully enclosed and inside transfer points at 2,000 lbs/hr
3 fully enclosed and inside transfer points at 1,000 lbs/hr
6 fully enclosed and inside transfer points at 500 lbs/hr
2 fully enclosed hoppers with a 4,000 ton capacity

$$0.00056(1-0.95)(4*2,000 + 3*1,000 + 6*500) + 0.00056(1-0.99)(2*4,000) = 0.4 \text{ lb/hr}$$

b. Emission Limitation:

0.6 ton of PE per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum tons of coal unloaded per rolling 12-month period, times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation) times (1- % control efficiency), and divide by 2,000 pounds per ton. The control efficiencies were supplied by the applicant as follows: fully enclosed and inside 95%; fully enclosed hopper 99% for:

13 fully enclosed and inside transfer points at 2,058,600 tons/yr
2 fully enclosed hoppers with a 4,000 ton capacity

$$[0.00056(1-0.95)(13*2,058,600) + 0.00056(1-0.99)(2*4,000)(8,760)] / 2000 = 0.6 \text{ ton/yr}$$

c. Emission Limitation:

0.2 pound per hour of particulate matter less than 10 micron (PM₁₀),

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum equipment capacity (tons of coal per hour), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation) times (1- % control

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efficiency), and divide by 2,000 pounds per ton. The control efficiencies were supplied by the applicant as follows: fully enclosed and inside 95% for ; fully enclosed hopper 99%:

4 fully enclosed and inside transfer points at 2,000 lbs/hr
 3 fully enclosed and inside transfer points at 1,000 lbs/hr
 6 fully enclosed and inside transfer points at 500 lbs/hr
 2 fully enclosed hoppers with a 4,000 ton capacity

$$0.00027(1-0.95)(4*2,000 + 3*1,000 + 6*500)+0.00027(1-0.99)(2*4,000) = 0.2 \text{ lb/hr}$$

d. Emission Limitation:

0.3 ton of PM₁₀ as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum tons of coal unloaded per rolling 12-month period (2,058,600 enforceable by FDS Coke permit B901), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation) times (1- % control efficiency), and divide by 2,000 pounds per ton. The control efficiencies were supplied by the applicant as follows: fully enclosed and inside 95%; fully enclosed hopper 99% for:

13 fully enclosed and inside transfer points at 2,058,600 tons/yr
 2 fully enclosed hoppers with a 4,000 ton capacity

$$[0.00027(1-0.95)(13*2,058,600) + 0.00027(1-0.99)(2*4,000)(8,760)] / 2000 = 0.3 \text{ ton/yr}$$

3. Compliance with the emission limitation(s) for the coal crushing and screening or transfer operations in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

0.45 pound per hour of particulate emissions (PE) per hour.

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Applicable Compliance Method:

Compliance shall be demonstrated by adding the emissions from the coal crusher and the emissions from the coal transfer. Multiply the maximum processing rate (1,000 tons/hr) by the permittee-supplied coal crushing particulate emission factor (0.020 lb/ton) and multiplying by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors to determine the emissions from the coal crusher (0.40 lb/hr).

Multiply the maximum processing rate (1,000 tons/hr) by the particulate emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation) multiplied by 4 transfer points, and multiplied by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors to determine the emissions from coal transfer (0.05 lb/hr).

b. Emission Limitation:

0.46 ton of PE per year.

Applicable Compliance Method:

Compliance shall be demonstrated by adding the emissions from the coal crusher and the emissions from the coal transfer. Multiply the maximum processing rate (2,058,600 tons/yr) by the permittee-supplied coal crushing particulate emission factor (0.020 lb/ton) and multiplying by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors and divide by 2000 lbs/ton to determine the emissions from the coal crusher (0.41 ton/yr).

Multiply the maximum processing rate (2,058,600 tons/yr) by the particulate emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation) multiplied by 4 transfer points, multiplied by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors and divided by 2000 lbs/ton to determine the emissions from coal transfer (0.05 ton/yr).

c. Emission Limitation:

0.14 pound of particulate matter less than 10 micron (PM₁₀) per hour

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Applicable Compliance Method:

Compliance shall be demonstrated by adding the emissions from the coal crusher and the emissions from the coal transfer. Multiply the maximum processing rate (1,000 tons/hr) by the permittee-supplied coal crushing particulate emission factor (0.006 lb/ton) and multiplying by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors to determine the emissions from the coal crusher (0.12 lb/hr).

Multiply the maximum processing rate (1,000 tons/hr) by the particulate emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation) multiplied by 4 transfer points, and multiplied by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors to determine the emissions from coal transfer (0.02 lb/hr).

d. Emission Limitation:

0.15 ton of PM₁₀ as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by adding the emissions from the coal crusher and the emissions from the coal transfer. Multiply the maximum processing rate (2,058,600 tons/yr) by the permittee-supplied coal crushing particulate emission factor (0.006 lb/ton) and multiplying by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors and divide by 2000 lbs/ton to determine the emissions from the coal crusher (0.12 ton/yr).

Multiply the maximum processing rate (2,058,600 tons/yr) by the particulate emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation) multiplied by 4 transfer points, multiplied by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors and divided by 2000 lbs/ton to determine the emissions from coal transfer (0.02 ton/yr).

4. Compliance with the visible emission limitation(s) for all emissions sources comprising this emissions unit, as listed in Section A.I. of these terms and conditions, shall be determined in accordance with the following method(s):

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a. Emission Limitation:

10 percent opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

b. Emission Limitation:

5 percent opacity, as a 6-minute average.

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Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

no visible emissions of fugitive dust

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 22 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(4).

5. Compliance with the emission limitation(s) for the coal storage piles, as listed in Section A.I. of these terms and conditions, shall be determined in accordance with the following method(s):

a. Emission Limitation:

0.024 pound per hour PE

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of the following:

i. coal pile load-in

Multiply the maximum tons of coal handled per hour (2,500) by the 0.00056 pound/ton PE emission factor times 0.01 (assuming a 99% control efficiency for total enclosure with cyclone vented indoors) = 0.014 lb/hr. The particulate emission factor was calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was supplied by the permittee.

ii. coal pile load-out

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Multiply the maximum tons of coal handled per year (550) times the 0.00056 pound/ton emission factor times 0.01 (assuming a 99% control efficiency for total enclosure with cyclone vented indoors) times 2 transfer points= 0.006 lb/hr. The particulate emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was supplied by the permittee.

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b. Emission Limitation:

0.014 pound per hour PM₁₀ emissions

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of the following:

i. coal pile load-in

Multiply the maximum tons of coal handled per year (2,500) times the 0.00027 pound/ton PM₁₀ emission factor times 0.01 (assuming a 99% control efficiency for total enclosure with cyclone vented indoors) = 0.007 lb/hr. The particulate emission factor was calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was supplied by the permittee.

ii. coal pile load-out

Multiply the maximum tons of coal handled per year (550) times the 0.00027 pound/ton PM₁₀ emission factor times 0.01 (assuming a 99% control efficiency for total enclosure with cyclone vented indoors) times 2 transfer points = 0.003 lb/hr. The PM₁₀ emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was supplied by the permittee.

c. Emission Limitation:

0.03 ton of PE as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of the following:

i. coal pile load-in

Multiply the maximum tons of coal handled per year (2,058,600 made enforceable by FDS Coke permit B901) times the 0.00056 pound/ton PE emission factor times 0.01 (assuming a 99% control efficiency for total enclosure with cyclone vented indoors) and divide by 2,000 pounds per

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ton = 0.0058 ton/yr. The particulate emission factor was calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was supplied by the permittee.

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- ii. coal pile load-out

Multiply the maximum tons of coal handled per year (2,058,600 made enforceable by FDS Coke permit B901) times the 0.00056 pound/ton emission factor times 0.01 (assuming a 99% control efficiency for total enclosure with cyclone vented indoors), times 2 transfer points and divide by 2,000 pounds per ton = 0.012 ton/yr. The particulate emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was supplied by the permittee.

- d. Emission Limitation:

0.02 ton of PM₁₀ as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the sum of the following:

- i. coal pile load-in

Multiply the maximum tons of coal handled per year (2,058,600 made enforceable by FDS Coke permit B901) times the 0.00027 pound/ton PM₁₀ emission factor times 0.01 (assuming a 99% control efficiency for total enclosure with cyclone vented indoors) and divide by 2,000 pounds per ton = 0.003 ton/yr. The particulate emission factor was calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was supplied by the permittee.

- ii. coal pile load-out

Multiply the maximum tons of coal handled per year (2,058,600 made enforceable by FDS Coke permit B901) times the 0.00027 pound/ton PM₁₀ emission factor times 0.01 (assuming a 99% control efficiency for total enclosure with cyclone vented indoors) times 2 transfer points, and divide by 2,000 pounds per ton = 0.006 ton/yr. The PM₁₀ emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) and Table 13.2.4-1, dated 1/95. The control efficiency was supplied by the

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permittee.

6. Compliance with the emission limitation(s) for the roller screen crusher operation in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
0.2 pound per hour of particulate matter (PE).

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Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum equipment capacity (2,000 tons of coal per hour), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation), multiplied by 3 transfer points, and multiplied by (1- % control efficiency). The control efficiency supplied by the applicant is 95% for being fully enclosed and inside.

$$0.00056(1-0.95)(3)(2,000) = 0.2 \text{ lb/hr}$$

b. Emission Limitation:

0.4 ton of PE per year

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum tons of coal unloaded per rolling 12-month period (8,760,000), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation) multiplied by 3 transfer points, multiplied by (1- % control efficiency), and divide by 2,000 pounds per ton. The control efficiency supplied by the applicant is 95% for being fully enclosed and inside.

$$0.00056(1-0.95)(3)(8,760,000)/ 2000 = 0.4 \text{ ton/yr}$$

c. Emission Limitation:

0.08 pound per hour of particulate matter less than 10 micron (PM₁₀),

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum equipment capacity (2,000 tons of coal per hour), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation) multiplied by 3 transfer points, and multiplied by (1- % control efficiency). The control efficiency supplied by the applicant is 95% for being fully enclosed and inside.

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$$0.00027(1-0.95)(3)(2,000) = 0.08 \text{ lb/hr}$$

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d. Emission Limitation:

0.02 ton of PM₁₀ as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum tons of coal unloaded per rolling 12-month period (8,760,000), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated

1/95 (0.00027 pound/ton for each operation), multiplied by 3 transfer points, multiplied by (1- % control efficiency), and divide by 2,000 pounds per ton. The control efficiency supplied by the applicant is 95% for being fully enclosed and inside.

$$0.00027(1-0.95)(3)(8,760,000) / 2000 = 0.2 \text{ ton/yr}$$

7. Compliance with the emission limitation(s) for the coal stamping unit in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

0.02 pound per hour of particulate emissions (PE) per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum processing rate (1,000 tons/hr) by the particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation), multiplied by 3 transfer points and multiplying by (1-0.99) to account for the permittee estimated overall control efficiency of a baghouse to determine the emissions from the coal stamping unit (0.4 lb/hr).

If required, the permittee shall demonstrate compliance based upon emission testing performed in accordance with Methods 1 through 4 and 5 of 40 CFR Part 60, Appendix A or an acceptable alternative test method approved in writing by the director of the Ohio EPA.

b. Emission Limitation:

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0.02 ton of PE per year.

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Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum processing rate (2,058,600 tons/yr) by the particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation), multiplied by 3 transfer points, multiplied by (1-0.99) to account for the permittee estimated overall control efficiency of a baghouse, and dividing by 2000 lb/ton to determine the emissions from the coal stamping unit (0.02 ton/yr).

c. Emission Limitation:

0.01 pound of particulate matter less than 10 micron (PM₁₀) per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum processing rate (1,000 tons/hr) by the PM₁₀ emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation), multiplied by 3 transfer points and multiplying by (1-0.99) to account for the permittee estimated overall control efficiency of a baghouse to determine the emissions from the coal stamping unit (0.01 lb/hr).

If required, the permittee shall demonstrate compliance through the emissions testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

0.01 ton of PM₁₀ as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum processing rate (2,058,600 tons/yr) by the PM₁₀ emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation), multiplied by 3 transfer points, multiplied by (1-0.99) to account for the permittee estimated overall control efficiency of a baghouse, and dividing by 2000 lb/ton to determine the emissions from the coal stamping unit (0.01 ton/yr).

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8. Compliance with the emission limitation(s) for the coal blending unit in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

0.05 pound per hour of particulate emissions (PE) per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum processing rate (1,000 tons/hr) by the particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation), multiplied by 4 transfer points and multiplying by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors to determine the emissions from the coal blending unit (0.05 lb/hr).

- b. Emission Limitation:

0.05 ton of PE per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum processing rate (2,058,600 tons/yr) by the particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00056 pound/ton for each operation), multiplied by 4 transfer points, multiplied by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors, and dividing by 2000 lb/ton to determine the emissions from the coal stamping unit (0.05 ton/yr).

- c. Emission Limitation:

0.02 pound of particulate matter less than 10 micron (PM₁₀) per hour

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum processing rate (1,000 tons/hr) by the PM₁₀ emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation), multiplied by 4 transfer points and multiplying by (1-0.98) to account for the

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permittee estimated control efficiency of a cyclone vented indoors to determine the emissions from the coal stamping unit (0.02 lb/hr).

d. Emission Limitation:

0.01 ton of PM₁₀ as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum processing rate (2,058,600 tons/yr) by the PM₁₀ emission factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00027 pound/ton for each operation), multiplied by 4 transfer points, multiplied by (1-0.98) to account for the permittee estimated control efficiency of a cyclone vented indoors, and dividing by 2000 lb/ton to determine the emissions from the coal blending unit (0.02 ton/yr).

9. Emission Testing Requirements:

The permittee shall conduct, or have conducted, emission testing for all emissions sources comprising this emissions unit in accordance with the following requirements.

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Toledo Division of Environmental Services.
- b. The emission testing shall be conducted to demonstrate compliance with the visible emission limitations from all fugitive sources .
- c. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
 - i. opacity: Method 9 of 40 CFR part 60, appendix A :
 - ii. fugitive building emissions: compliance shall be determined in accordance with Test Method 22. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

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- d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services (TDOES). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operation parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the TDOES's refusal to accept the results of the emission tests.

Personnel from the TDOES shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions unit and /or the performance of the control equipment. A comprehensive written report on the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the TDOES within 30 days following completion of the tests.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-31-10 thru 20
F006 - coke handling - coke sizing tower (fully enclosing the crushing and screening operations) controlled with a cyclone vented indoors	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07 (B)(1)	
	OAC rule 3745-17-08 (B)	
	OAC rule 3745-31-10 thru 20	
coke and breeze processing - coke hopper, vibratory feeder, conveyors, storage hoppers, and load-in & load- out from nut coke & breeze hoppers	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07 (B)(1)	
	OAC rule 3745-17-08 (B)	

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Applicable Emissions
Limitations/Control Measures

0.27 pound per hour of
particulate emissions (PE),
0.48 ton of PE per year,
0.09 pound per hour of
particulate matter less than 10
micron (PM₁₀),
and see section A.I.2.b, 2.c, 2.d

See section A.I.2.e.

See section A.I.2.e.

0.13 ton of PM₁₀ as a rolling,
12-month summation.

0.2 pound per hour of
particulate emissions (PE),
0.24 ton of PE per year,
0.07 pound per hour of
particulate matter less than 10
micron (PM₁₀),
and see section A.I.2.b, 2.c,
2.d, and 2.f.

See section A.I.2.e.

See section A.I.2.e.

0.1 ton of PM₁₀ as a rolling,
12-month summation.

2. Additional Terms and Conditions

- 2.a** The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

Company ID Equipment Description

eight (8) partially enclosed transfer points with wetting or chute
 eight (8) fully enclosed and inside transfer points
 three (3) fully enclosed storage hoppers

- 2.b** i. The permittee shall employ best available control measures for all coke handling operations for the purpose of ensuring compliance with the emissions limitations above. These control measures shall include, but not be limited to, the addition of moisture, the enclosure of the emissions sources and the addition of dust control systems.
- ii. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.c** No visible emissions of fugitive dust from any full enclosure serving the processes comprising this emissions unit.
- 2.d** The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-31-10 thru 20 and OAC rule 3745-17-08(B).
- 2.e** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.f** The visible emissions of fugitive dust from any source that is not fully enclosed (as described above) shall not exceed 10% opacity as a 3-minute average.

B. Operational Restrictions

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1. All of the equipment comprising the Coke Sizing Tower shall be fully enclosed and all emissions shall be controlled with a cyclone that exhausts to the interior of the sizing tower..
2. The permittee shall operate the Coke Sizing Tower cyclone whenever the respective emission unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the Coke Sizing Tower cyclone was not in service when the respective emissions unit was in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, 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.

D. Reporting Requirements

1. The permittee shall submit written quarterly deviation reports to the Toledo Division of Environmental Services which (a) identify all days during which a baghouse was not in service when the respective emissions unit was in operation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the quarter. These reports are due by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar

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quarters.

2. The permittee shall submit written quarterly deviation reports to the Toledo Division of Environmental Services which (a) identify all days during which any visible fugitive particulate emissions were observed from the equipment comprising this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during the quarter. These reports are due by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

E. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

5% opacity, as a six-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

0.09 lbs/hr of PM₁₀

Applicable Compliance Method:

The total hourly PM₁₀ emissions are determined by adding the coke crushing, screening and material handling emissions. Multiply the maximum coke processing rate (500 tons/hr) by the coke crushing emission factor supplied by the permittee (0.006 lb PM₁₀/ton) multiplied by (1-0.98) to account for the estimated overall control efficiency to determine the emissions from coke crushing (0.06 lb/hr). Multiply the maximum coke processing rate (500 tons/hr) by the number of screening and transfer points (9), and multiply by the coke handling emission factor from AP-42 Section 13.2.4-1 dated 1/1995 (0.00034 lb PM₁₀/ton), and multiply by (1-0.98) to account for the estimated overall control efficiency of 98% to obtain the emissions from coke screening and handling (0.03 lb/hr). Add the emissions from coke crushing (0.06 lb/hr) to the emissions from coke screening and handling (0.03 lb/hr) to obtain the total emissions (0.09 lbs/hr).

- c. Emission Limitation:

0.13 ton of PM₁₀ per year

Applicable Compliance Method:

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The total annual PM₁₀ emissions are determined by adding the coke crushing, screening and material handling emissions. Multiply the maximum coke processing rate (1,440,000 tons/yr) by the coke crushing emission factor supplied by the permittee (0.006 lb PM₁₀/ton) multiplied by (1-0.98) to account for the estimated overall control efficiency to determine the emissions from coke crushing (172.8 lbs/yr). Multiply the maximum coke processing rate (1,440,000 tons/yr) by the number of screening and transfer points (9), and multiply by the coke handling emission factor from AP-42 Section 13.2.4-1 dated 1/1995 (0.00034 lb PM₁₀/ton), and multiply by (1-0.98) to account for the estimated overall control efficiency of 98% to obtain the emissions from coke screening and handling (88.1 lbs/yr). Add the emissions from coke crushing (172.8 lbs/yr) to the emissions from coke screening and handling (88.1 lbs/yr) and divide by 2000 lbs/ton to obtain the total emissions (0.13 ton/yr).

d. Emission Limitation:

0.27 lb/hr of PE

Applicable Compliance Method:

The total hourly particulate emissions are determined by adding the coke crushing, screening and material handling emissions. Multiply the maximum coke processing rate (500 tons/hr) by the coke crushing emission factor supplied by the permittee (0.02 lb PE/ton) multiplied by (1-0.98) to account for the estimated overall control efficiency to determine the emissions from coke crushing (0.2 lb/hr). Multiply the maximum coke processing rate (500 tons/hr) by the number of screening and transfer points (9), and multiply by the coke handling emission factor from AP-42 Section 13.2.4-1 dated 1/1995 (0.00073 lb PE/ton), and multiply by (1-0.98) to account for the estimated overall control efficiency of 98% to obtain the emissions from coke screening and handling (0.066 lb/hr). Add the emissions from coke crushing (0.2 lb/hr) to the emissions from coke screening and handling (0.066 lb/hr) to obtain the total emissions (0.27 lbs/hr).

e. Emission Limitation:

0.48 ton of PE per year.

Applicable Compliance Method:

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The total annual particulate emissions are determined by adding the coke crushing, screening and material handling emissions. Multiply the maximum coke processing rate (1,440,000 tons/yr) by the coke crushing emission factor supplied by the permittee (0.02 lb PE/ton) multiplied by (1-0.98) to account for the estimated overall control efficiency to determine the emissions from coke crushing (576 lbs/yr). Multiply the maximum coke processing rate (1,440,000 tons/yr) by the number of screening and transfer points (9), and multiply by the coke handling emission factor from AP-42 Section 13.2.4-1 dated 1/1995 (0.00073 lb PE/ton), and multiply by (1-0.98) to account for the estimated overall control efficiency of 98% to obtain the emissions from coke screening and handling (189.2 lbs/yr). Add the emissions from coke crushing (576 lbs/yr) to the emissions from coke screening and handling (189.2 lbs/yr) and divide by 2000 lbs/ton to obtain the total emissions (0.48 ton/yr).

f. Emission Limitation:

10% opacity, as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

g. Emission Limitation:

0.07 lb/hr of PM₁₀

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum equipment capacity (tons of coke per hour), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00034 pound/ton for each operation) times (1- % control efficiency). The control efficiencies are based on the applicant's estimate as follows: partial enclosure and adequate moisture or chutes - 85% and 95% for FE and indoors (TDOES is accepting this control estimate based upon compliance with 10 % opacity) for:

four (4) partially enclosed transfer points with wetting or chute at 210 tons/hr
 two (2) partially enclosed transfer points with wetting or chute at 30 tons/hr

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two (2) partially enclosed transfer points with wetting or chute at 15 tons/hr
 five (5) fully enclosed and inside transfer points at 210 tons/hr
 one (1) fully enclosed and inside transfer point at 500 tons/hr
 one (1) fully enclosed and inside transfer point at 30 tons/hr
 one (1) fully enclosed and inside transfer point at 15 tons/hr
 three (3) fully enclosed storage hoppers, (2) with a 1,000 ton capacity and (1) with a 2,000 ton capacity

This results in the following calculation: $(((4 \times 210) + (2 \times 30) + (2 \times 15)) \times (1-0.85) \times 0.00034) + ((5 \times 210) + (1 \times 500) + (1 \times 30) + (1 \times 15)) \times (1-0.95) \times (0.00034) + ((1 \times 2000) + (2 \times 1000)) \times (1-0.99) \times 0.00034/8760] = 0.07 \text{ lb/hr}$

h. Emission Limitation:

0.1 ton of PM₁₀ as a rolling 12-month summation:.

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the annual processing rate at each transfer point, times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00034 pound/ton for each operation) times (1 - % control efficiency) divided by 2000 pounds per ton. The control efficiencies are based on the applicant's estimate as follows: partial enclosure and adequate moisture - 85% and 95% for FE and indoors (TDOES is accepting this control estimate based upon no visible emissions) for:

two (2) partially enclosed transfer points with wetting or chute at 1,039,200 tons/yr
 two (2) partially enclosed transfer points with wetting or chute at 57,600 tons/yr
 two (2) partially enclosed transfer points with wetting or chute at 43,200 tons/yr
 two (2) partially enclosed transfer points with wetting or chute at 718,320 tons/yr
 two (2) fully enclosed and inside transfer points at 718,320 tons/yr
 two (2) fully enclosed and inside transfer points at 297,840 tons/yr
 one (1) fully enclosed and inside transfer points at 61,320 tons/yr
 one (1) fully enclosed and inside transfer points at 43,800 tons/yr
 three (3) fully enclosed storage hoppers, (2) with a 1,000 ton capacity and (1) with a 2,000 ton capacity

The above hourly capacities are based an annual average

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This results in the following calculation: $[(2 \times 1,039,200) + (2 \times 57,600) + (2 \times 43,200) + (2 \times 718,320)] \times (1 - 0.85) \times 0.00034 + [(2 \times 718,320) + (2 \times 297,840) + (1 \times 61,320) + (1 \times 43,800)] \times (1 - 0.95) \times (0.00034) + [(1 \times 2000) + (2 \times 1000)] \times (1 - 0.99) \times (0.00034) / 2000 = 0.1 \text{ ton/yr}$

i. Emission Limitation:

0.2 lb/hr of PE

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the maximum equipment capacity (tons of coke per hour), times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00073 pound/ton for each operation) times (1 - % control efficiency). The control efficiencies were obtained from the company as follows: partial enclosure with adequate moisture or chute - 85% and 95% for full enclosure and inside (TDOES is accepting this control estimate based upon no visible emissions) for:

four (4) partially enclosed transfer points with wetting or chute at 210 tons/hr
 two (2) partially enclosed transfer points with wetting or chute at 30 tons/hr
 two (2) partially enclosed transfer points with wetting or chute at 15 tons/hr
 five (5) fully enclosed and inside transfer points at 210 tons/hr
 one (1) fully enclosed and inside transfer point at 500 tons/hr
 one (1) fully enclosed and inside transfer point at 30 tons/hr
 one (1) fully enclosed and inside transfer point at 15 tons/hr
 three (3) fully enclosed storage hoppers, (2) with a 1,000 ton capacity and (1) with a 2,000 ton capacity

This results in the following calculation: $[(4 \times 210) + (2 \times 30) + (2 \times 15)] \times (1 - 0.85) \times 0.00073 + [(5 \times 210) + (1 \times 500) + (1 \times 30) + (1 \times 15)] \times (1 - 0.95) \times (0.00073) + [(1 \times 2000) + (2 \times 1000)] \times (1 - 0.99) \times 0.00073 / 8760 = 0.2 \text{ lb/hr}$

j. Emission Limitation:

0.24 ton of PE per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation: multiply the

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annual processing rate at each transfer point, times a particulate emissions factor calculated from AP-42 5th Edition, Section 13.2.4, Equation (1) dated 1/95 (0.00073 pound/ton for each operation) times (1- % control efficiency) divided by 2000 pounds per ton. The control efficiencies were obtained from the company as follows: partial enclosure with adequate moisture or chute - 85% and 95% for full enclosure and inside (TDOES is accepting this control estimate based upon no visible emissions) for:

two (2) partially enclosed transfer points with wetting or chute at 1,039,200 tons/yr

two (2) partially enclosed transfer points with wetting or chute at 57,600 tons/yr

two (2) partially enclosed transfer points with wetting or chute at 43,200 tons/yr

two (2) partially enclosed transfer points with wetting or chute at 718,320 tons/yr

two (2) fully enclosed and inside transfer points at 718,320 tons/yr

two (2) fully enclosed and inside transfer points at 297,840 tons/yr

one (1) fully enclosed and inside transfer points at 61,320 tons/yr

one (1) fully enclosed and inside transfer points at 43,800 tons/yr

three (3) fully enclosed storage hoppers, (2) with a 1,000 ton capacity and (1) with a 2,000 ton capacity

The above hourly capacities are based an annual average

This results in the following calculation: $[(2 \times 1,039,200) + (2 \times 57,600) + (2 \times 43,200) + (2 \times 718,320)] \times (1 - 0.85) \times 0.00073 + [(2 \times 718,320) + (2 \times 297,840) + (1 \times 61,320) + (1 \times 43,800)] \times (1 - 0.95) \times (0.00073) + [(1 \times 2000) + (2 \times 1000)] \times (1 - 0.99) \times (0.00073) / 2000 = 0.24 \text{ ton/yr}$

k. Emission Limitation:

no visible emissions of fugitive dust

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 22 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(4).

2. Emission Testing Requirements:

The permittee shall conduct, or have conducted, emission testing for all emissions

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sources comprising this emissions unit in accordance with the following requirements.

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Toledo Division of Environmental Services.
- b. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
 - i. opacity: Method 9 of 40 CFR part 60, appendix A :
 - ii. fugitive building emissions: compliance shall be determined in accordance with Test Method 22. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.
- e. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services (TDOES). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operation parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the TDOES's refusal to accept the results of the emission tests.

Personnel from the TDOES shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions unit and /or the performance of the control equipment. A comprehensive written report on the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the TDOES within 30 days following completion of the tests.

F. Miscellaneous Requirements

None