



State of Ohio Environmental Protection Agency

RE: FINAL COMBINED AIR/WASTE WATER PERMIT TO INSTALL **CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

GALLIA COUNTY
Application No: 06-06694

DATE: 5/7/2002

DTE Energy Services Gavin
Katherine Panczak
414 South Main St. Suite 600
Ann Arbor, MI 48104

Enclosed please find a combined air/wastewater Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section

cc: SEDO

Patti L. Smith, Permit Processing Supervisor
Division of Surface Water



**Permit To Install
Terms and Conditions**

**Issue Date: 5/7/2002
Effective Date: 5/7/2002**

COMBINED AIR/WASTE WATER PERMIT TO INSTALL 06-06694

Application Number: 06-06694
APS Premise Number: 0627000053
Air Permit Fee: **\$11450**
Name of Facility: DTE Energy Services Gavin
Person to Contact: Katherine Panczak
Address: 414 South Main St. Suite 600
Ann Arbor, MI 48104

Location of proposed air contaminant source(s) [emissions unit(s)]:

**State Route 7
Cheshire, Ohio**

Description of proposed emissions unit(s):

Material handling conveying snyfuel processing liquid storage tanks.

Description of Proposed Waste Water Source:

**Sanitary Sewer Extension and Wash Water Collection Sumps for DTE Buckeye, LLC Synthetic Fuels Facility,
Cheshire Township, Gallia County**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) and waste water sources 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) and waste water sources 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

Christopher Jones
Director

SECTION I
APPLICABLE AIR REQUIREMENTS

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. 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).

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. 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>
Particulate emissions	3.68
VOC's	1.46

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
F001 - Storage Piles.(Synfuel Pile) (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	Annual emissions of particulate emissions shall not exceed 0.72 tons. no visible emissions except for one minute in any hour. best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c and A.2.f)
wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	no visible emissions except for one minute in any hour. best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.f)
	40 CFR 60 Subpart Y	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. Additional Terms and Conditions

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- 2.a** The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05(a)(3) are listed below:

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Synfuel Pile

The Synfuel Pile is located above the reclaim conveyor currently permitted by AEP.

There are no load-out emissions for this process, they are included with AEP's current permit.

- 2.b** The permittee shall employ best available control measures on all load-in 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 material moisture content will be sufficient to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The above-mentioned control measure(s) shall be employed for each load-in 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.d** 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 treating the piles with a latex binder 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 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.f** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(a)(3).

B. Operational Restrictions

None

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Emissions Unit ID: **F001**
Facility ID: **0627000053**

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>
Synfuel Pile	Daily

- 2. 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>
Synfuel Pile	Daily

- 3. 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 week.
- 4. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in 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.
- 5. 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 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;

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- 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

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- 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 for 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 deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

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

The emission testing shall be conducted within 180 days of start-up of the emissions unit.

The emission testing shall be conducted to demonstrate compliance with the visible emission limitation for fugitive emissions.

The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s): for visible emissions, Method 22 of 40 CFR 60, Appendix A.

Emissions Unit ID: **F001****DTE Energy Services Gavin****PTI Application: 06-06694****Issued: 5/7/2002****Facility ID: 0627000053**

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

None

DTE I

PTI A

Issued: 5/7/2002

Emissions Unit ID: F003

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>
F003 - Briquetting operation including conveying, crushing and screening	OAC rule 3745-31-05(A)(3)
	40 CFR 60 Subpart Y
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)

DTE I**PTI A****Issued: 5/7/2002**Emissions Unit ID: **F003**

Applicable Emissions
Limitations/Control Measures

Total emissions of particulate emissions shall not exceed 0.675 lb/hr and 2.96 TPY.

The requirements of this rule also include compliance with the requirements of 40 CFR 60 Subpart Y .

The permittee shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal, gases which exhibit 20 percent opacity or greater.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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. Additional Terms and Conditions

- 2.a** The permittee shall employ best available control measures on the Briquetting Operation for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee shall install and maintain enclosures and vent emissions to a fabric filter and/or treat the material with a

Emissions Unit ID: **F003**

latex binder which is capable of meeting the applicable requirements to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.b** The specific equipment that are covered by this permit and subject to 40 CFR 60 Subpart Y are listed below:

3 reclaim conveyors (equivalent of 1 feeder reclaim system); 2 crusher diverter gates, 2 screens, 2 crushers, 2 Synfuel feed conveyors, 2 Synfuel plant splitter gates, 3 transfer conveyors feeding storage bins, 7 storage bins, 7 weigh feeders, 7 pugmill feed conveyors, 7 pugmills, 7 briquette feed conveyors, 7 briquetters, 1 briquette collection conveyor, 1 stacker feed conveyor, 1 stacker conveyor, 2 sampling systems and the associated transfer points.

B. Operational Restrictions

The pressure drop across the baghouse shall be maintained within the range of 2 - 10 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, while the equipment is in operation, for any visible particulate emissions from the enclosures 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 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 operations;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall maintain daily records of the operating hours for this emissions unit.

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4. The permittee may, upon receipt of written approval from the Ohio EPA, Southeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned, applicable requirements.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (i) identify all days during which any visible particulate emissions were observed from the enclosures serving this emissions unit and (ii) 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.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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):

1. **Emission Limitation**
The permittee shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal, gases which exhibit 20 percent opacity or greater.

Applicable Compliance Method

Compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 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)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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

The emission testing shall be conducted within 180 days of start-up of the emissions unit.

The emission testing shall be conducted to demonstrate compliance with the visible emission limitation for fugitive emissions.

The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s): for visible emissions, Method 9 of 40 CFR 60, Appendix A.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

2. Emission Limitation

Total emissions of particulate emissions shall not exceed 0.675 lb/hr

Applicable Compliance Method

Compliance shall be demonstrated based upon the following equations:

The following equipment has a maximum process weight rate of 1000 TPH and an uncontrolled emission factor of 0.0003 lb/ton as determined by USEPA.

Feeder conveyor to crusher feeder, feed conveyor to screening tower, 2 feed conveyor screening

tower

$$1000 \text{ ton/hr} * 0.0003 \text{ lb/ton} * (1 - 0.8) = 0.06$$

$$0.042 \text{ lb/hr} * 4 \text{ pieces of equipment} = 0.24 \text{ lb/hr}$$

The following equipment has a maximum process weight rate of 500 TPH and an uncontrolled emission factor of 0.0003 lb/ton as determined by USEPA.

2 diverter gate to screen, 2 screening operation, 2 screen to crusher, 2 crusher to synfuel plant feed conveyor

$$500 \text{ ton/hr} * 0.0003 \text{ lb/ton} * (1 - 0.95) = 0.0075 \text{ lb/hr}$$

$$0.0075 \text{ lb/hr} * 8 \text{ pieces of equipment} = 0.06 \text{ lb/hr}$$

The following equipment has a maximum process weight rate of 200 TPH and an uncontrolled emission factor of 0.0003 lb/ton as determined by USEPA.

7 storage bins to weight feeders, 7 weight feeders to pugmill feed conveyors, 7 pugmill feed conveyors to pugmills

$$200 \text{ ton/hr} * 0.0003 \text{ lb/ton} * (1 - 0.95) = 0.003 \text{ lb/hr}$$

$$0.003 \text{ lb/hr} * 21 \text{ pieces of equipment} = 0.063 \text{ lb/hr}$$

The following equipment has a maximum process weight rate of 204 TPH and an uncontrolled emission factor of 0.0003 lb/ton as determined by USEPA.

7 pugmill operations, 7 pugmills to briquette feed conveyors, 7 briquette feed conveyors to briquetters, 7 briquetter operations, 7 briquetters to briquetter collecting conveyor

$$204 \text{ ton/hr} * 0.0003 \text{ lb/ton} * (1 - 0.95) = 0.00306 \text{ lb/hr}$$

$$0.00306 \text{ lb/hr} * 35 \text{ pieces of equipment} = 0.11 \text{ lb/hr}$$

2 crusher operations

$$500 \text{ ton/hr} * 0.0004 \text{ lb/ton} * (1 - 0.95) = 0.01 \text{ lb/hr}$$

$$0.01 \text{ lb/hr} * 2 \text{ pieces of equipment} = 0.02 \text{ lb/hr}$$

6 splitter gate to storage bins

$$1000 \text{ ton/hr total} * 0.0003 \text{ lb/ton} * (1 - 0.8) = 0.06 \text{ lb/hr}$$

2 briquetter collecting conveyors to synfuel stacker feed conveyor

$510 \text{ ton/hr total} * 0.0003 \text{ lb/ton} * (1 - 0.8) = 0.0306 \text{ lb/hr}$

$0.0306 \text{ lb/hr} * 2 \text{ pieces of equipment} = 0.0612 \text{ lb/hr}$

Synfuel stacker feed conveyor to stacker conveyor

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$$1020 \text{ ton/hr total} * 0.0003 \text{ lb/ton} * (1 - 0.95) = 0.0153 \text{ lb/hr}$$

Crusher feed conveyor to diverter gate

$$1000 \text{ ton/hr total} * 0.0003 \text{ lb/ton} * (1 - 0.95) = 0.015 \text{ lb/hr}$$

2 synfuel plant feed to splitter gate

$$500 \text{ ton/hr total} * 0.0003 \text{ lb/ton} * (1 - 0.8) = 0.03 \text{ lb/hr}$$

Total Hourly Emissions

$$E = 0.24 \text{ lb/hr} + 0.06 \text{ lb/hr} + 0.063 \text{ lb/hr} + 0.11 \text{ lb/hr} + 0.02 \text{ lb/hr} + 0.06 \text{ lb/hr} + 0.0612 \text{ lb/hr} + 0.0153 \text{ lb/hr} + 0.015 \text{ lb/hr} + 0.03 \text{ lb/hr} = 0.675 \text{ lb/hr}$$

3. Emission Limitation

Total emissions of particulate emissions shall not exceed 2.96 TPY

Applicable Compliance Method

Compliance shall be demonstrated based upon the following equation:

$$E = 0.675 \text{ lb/hr} * \text{AAHO} * 0.0005 \text{ ton/lb} = \text{TPY}$$

Where

0.675 lb/hr is the hourly emission rate determined by emission factors, submitted by the permittee and developed by USEPA Region 4, Kentucky DEP and an outside contractor, or the most recent performance test

AAHO is the actual annual hours of operation of the emissions unit.

F. Miscellaneous Requirements

None

DTE I

PTI A

Issued: 5/7/2002

Emissions Unit ID: **T001**

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>
T001 - 25000 Gallon Storage Tank.	OAC rule 3745-31-05(A)(3)	Annual emissions of Volatile Organic Compounds shall not exceed 0.73 tons
	OAC rule 3745-21-09(L)(2)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb (NSPS) and the tank shall be equipped with submerged fill.
	40 CFR 60 Subpart Kb	exempt (see section A.2 below) See Section C.1. below

2. Additional Terms and Conditions

- 2.a In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The application and enforcement of the provisions of the New Source Performance Standards

DTE I**PTI A**Emissions Unit ID: **T001****Issued: 5/7/2002**

(NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

D. Reporting Requirements

None

E. Testing Requirements

Emission Limitation:
0.73 TPY VOC

Applicable Compliance Method:

Compliance shall be determined by a one time calculation using the TANKS Program 4.0 or other method acceptable to the Ohio EPA Southeast District Office.

F. Miscellaneous Requirements

None

DTE I

PTI A

Issued: 5/7/2002

Emissions Unit ID: T002

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>
T002 - 20000 Gallon Storage Tank.	OAC rule 3745-31-05(A)(3)	Annual emissions of Volatile Organic Compounds shall not exceed 0.73 tons
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb (NSPS) and the tank shall be equipped with submerged fill.
	OAC rule 3745-21-09(L)(2)	exempt (See Section A.2 below)
	40 CFR 60 Subpart Kb	See Section C.1 below

2. Additional Terms and Conditions

- 2.a In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The application and enforcement of the provisions of the New Source Performance Standards

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PTI Application: 06-06604
Issued

Facility ID: 0627000053

Emissions Unit ID: **T002**

(NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

D. Reporting Requirements

None

E. Testing Requirements

Emission Limitation:
0.73 TPY VOC

Applicable Compliance Method:
Compliance shall be determined by a one time calculation using the TANKS Program 4.0 or other method acceptable to the Ohio EPA Southeast District Office.

F. Miscellaneous Requirements

None

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Facility ID: 0627000053

SECTION II

APPLICABLE WASTEWATER REQUIREMENTS

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Issued: 5/7/2002

Facility ID: 0627000053

This permit shall expire if construction has not been initiated by the applicant within eighteen months of the effective date of this permit. By accepting this permit, the applicant acknowledges that this eighteen month period shall not be considered or construed as extending or having any effect whatsoever on any compliance schedule or deadline set forth in any administrative or court order issued to or binding upon the permit applicant, and the applicant shall abide by such compliance schedules or deadlines to avoid the initiation of additional legal action by the Ohio EPA.

The director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, examining records, or reports pertaining to the construction, modification, or installation of the above described source of environmental pollutants.

Issuance of this permit does not relieve you of the duty of complying with all applicable federal, state, and local laws, ordinances, and regulations.

Any well, well point, pit, or other device installed for the purpose of lowering the ground water level to facilitate construction of this project shall be properly abandoned in accordance with the provisions of this plan or as directed by the director or his representative.

Any person installing any well, well point, pit or other device used for the purpose of removing ground water from an aquifer shall complete and file a Well Log and Drilling Report form with the Ohio Department of Natural Resources, Division of Water, within 30 days of the well completion in accordance with the Ohio Revised code Section 1521.01 and 1521.05. In addition, any such facility that has a capacity to withdraw waters of the state in an amount greater than 100,000 gallons per day from all sources shall be registered by the owner with the chief of the Division of Water, Ohio Department of Natural Resources, within three months after the facility is completed in accordance with Section 1521.16 of the Ohio Revised Code. For copies of the necessary well log, drilling report, or registration forms, please contact:

Ohio Department of Natural Resources

Fountain Square
Columbus, OH 43224-1387
(614) 265-6717

The proposed wastewater disposal system shall be constructed in strict accordance with the plans and application approved by the director of the Ohio Environmental Protection Agency. There shall be no deviation from these plans without the prior express, written approval of the agency. Any deviations from these plans or the above conditions may lead to such sanctions and penalties as provided for under Ohio law. Approval of this plan and issuance of this permit does not constitute an assurance by the Ohio Environmental Protection Agency that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or

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cannot meet applicable standards.

This permit applies to a wastewater disposal system designed to serve an average daily hydraulic flow of no more than 2,350 gallons.

Roof drains, foundation drains, and other clean water connections to the sanitary sewer system are prohibited.

No liquids, sludges, or toxic or hazardous substances other than those set forth in the approved permit shall be accepted for disposal without the prior written approval of the Ohio Environmental Protection Agency.

Sewer and manhole construction joints shall conform to standards of the Ohio Environmental Protection Agency. Construction of any wastewater treatment works shall be completed and operation of the facility approved by the Ohio Environmental Protection Agency before sewage or other wastewater is generated by the applicant or is discharged to the wastewater disposal system.

The Southeast District Office of the Ohio Environmental Protection Agency shall be notified in writing as to (a) the construction starting date; (b) the construction completion date; and (c) the date the wastewater disposal system was placed into operation.

The owner shall be responsible for proper operation and maintenance of the sewerage system.

Special Conditions: Air Pollution Control Requirements:

Fugitive dust generated by this sewer construction project will be controlled as specified in OAC 3745-17-08(B) which includes, but is not limited to, the following:

No person shall cause or permit any fugitive dust source to be operated; or any materials to be handled, transported, or stored; or a building or its appurtenances or a road to be used constructed, altered, repaired, or demolished without taking or installing reasonably available control measures to prevent fugitive dust from becoming airborne. Such reasonably available control measures shall include, but not be limited to, one or more of the following which are appropriate to minimize or eliminate visible emissions or fugitive dust:

- (1) The use of water or other suitable dust suppression chemicals for the control of fugitive dust from the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- (2) The periodic application of asphalt, water, or other suitable dust suppression chemicals on dirt or gravel roads and parking lots, and other surfaces which can cause emissions of fugitive dust;
- (3) The covering at all times, of open bodied vehicles when transporting materials likely to become airborne;
- (4) The paving of roadways and the maintaining of roadways in a clean condition; and

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- (5) The prompt removal, in such a manner as to minimize or prevent resuspension, of earth or other materials that has been deposited by trucking or earth moving equipment or erosion by water or other means.

Special Conditions: Division of Drinking and Groundwater Requirements

All sanitary sewers or manholes shall be placed with at least 10 feet horizontal separation from waterlines. Whenever a waterline and sewer must cross, the sewer main shall be laid such that the crown of the sewer is at least 18 inches below the invert of the waterline measured between the outside pipe walls. In cases where the required separation cannot be maintained, closer installation may be permitted on a case-by-case basis only after receipt of written concurrence from the Ohio EPA Division of Drinking Water.