



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
HARRISON COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:  
Lazarus Gov. Center  
P.O. Box 1049

**Application No: 06-08140**

**Fac ID: 0634950025**

**DATE: 5/31/2007**

Eastern Ohio Coal, LLC  
Benjamin Wurts  
536 N. Main St.  
Cadiz, OH 43907

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

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

CC: USEPA

SEDO



Permit To Install  
Terms and Conditions

Issue Date: 5/31/2007  
Effective Date: 5/31/2007

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 06-08140**

Application Number: 06-08140  
Facility ID: 0634950025  
Permit Fee: **\$0**  
Name of Facility: Eastern Ohio Coal, LLC  
Person to Contact: Benjamin Wurts  
Address: 536 N. Main St.  
Cadiz, OH 43907

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**Flemming Rd., County 52**  
**Jewett, Ohio**

Description of proposed emissions unit(s):  
**Ad mod to 06-08140 to correct typo ( 1510 to 1150 ).**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director

## 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

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 (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. 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

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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 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)**

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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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **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.

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**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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

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>
PE	61.62
NO <sub>x</sub>	23.7
CO	12.7
SO <sub>2</sub>	4.9
OC	5.7

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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.

**Operations, Property, and/or Equipment - (P901) - 300 TPH portable Eagle Manufacturing model 1400-45 stone crusher with screens, conveyors with water spray bars and an attached 510 HP diesel 175 kW electric generator.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
300 TPH portable Eagle Manufacturing model 1400-45 stone crusher with load-in/load-out, screens, 7 conveyors, 14 transfer points and water spray bars	
OAC rule 3745-31-05(A)(3)	<p>Screening and transfer total fugitive particulate emissions (PE) shall not exceed a 4.56 tons per year.</p> <p>Crusher total fugitive PE shall not exceed a 0.66 tons per year.</p> <p>Visible emissions of fugitive dust discharging from the transfer points and conveyors shall not exceed 10% opacity.</p> <p>Visible emissions of fugitive dust discharging from the crusher shall not exceed 15% opacity.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.f. through A.2.i).</p>
OAC rule 3745-17-07(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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40 CFR Part 60 Subpart OOO	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
<b>510 HP diesel generator for 300 TPH portable aggregate plant</b>	
OAC rule 3745-31-05(A)(3)	Emissions shall not exceed:  5.4 lb/hr of nitrogen oxides (NO <sub>x</sub> ), 23.7 TPY;  2.9 lb/hr of carbon monoxide (CO), 12.7 TPY.  1.1 lb/hr of sulfur dioxide (SO <sub>2</sub> ), 4.9 TPY;  0.17 lb/hr of particulate emissions (PE) , 0.7 TPY;  1.3 lb/hr of organic compounds (OC), 5.7 TPY; and  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(5)(a), 3745-17-07(A), 3745-21-08(B), and 3745-23-06(B). See section A.2.j. below.
OAC rule 3745-17-11(B)(5)(a)	PE shall not exceed 0.25 lb/million Btu of actual heat input. See section A.2.a. below.  PE shall not exceed 0.310 lb/million Btu of actual heat input. See section A.2.b. below.
OAC rule 3745-17-07(A)(1)	Visible emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.
OAC rule 3745-18-06(G)	Exempt. See section A.2.c. below.
OAC rule 3745-21-08(B)	See section A.2.d. below.
OAC rule 3745-23-06(B)	See section A.2.e. below.

**2. Additional Terms and Conditions**

- 2.a** The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.310 lb/million Btu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.b** This particulate emission limitation shall be effective and federally enforceable

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on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

- 2.c** This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC 3745-31-05(A)(3) in this Permit to Install.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.f** The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

7 conveyor belts w/ 14 transfer points:

- Crusher to Grizzly storage
- Crusher to screen feed belt
- Screen feed belt
- Screen to fines
- Screen to 4's

- Screen to 57's
- Screen to 1's & 2's

**2.g** The permittee shall employ best available control measures for the above-identified material handling operations 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 perform the following control measures to ensure compliance:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
transfer points including load-in load-off to storage piles	watering watering at storage pile
conveyor belts	watering
- Crusher to Grizzly storage	
- Crusher to screen feed belt	
- Screen feed belt	
- Screen to fines	
- Screen to 4's	
- Screen to 57's	
- Screen to 1's & 2's	

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2.h** For each material handling operation that is not adequately enclosed, the above-identified control measures 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure(s) is unnecessary.

**2.i** 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.

**2.j** The engine shall meet USEPA Tier 2 emissions standards.

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**B. Operational Restrictions**

1. The permittee shall only burn low sulfur No. 2 or diesel fuel, containing less than 0.5% sulfur by weight, in this emissions unit.

**C. Monitoring and/or Recordkeeping Requirements**

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
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All	Daily
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2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed;
  - 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.

The information in C.3.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

4. For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
5. The permittee shall maintain documentation on the sulfur content, in percent by weight, of all fuels received.

#### D. Reporting Requirements

1. For material handling operations, 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; and,
  - b. each instance when a control measure, that was to be performed 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.
3. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. actual start-up date (within 15 days after such date); and
  - d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P. O. Box 1049  
Columbus, Ohio 43216-1049

and

Southeast District Office of the Ohio EPA  
Division of Air Pollution Control  
2195 Front Street  
Logan, Ohio 43138.

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4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

**E. Testing Requirements**

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

- a. Emission Limitation:

**Screening and Transfer:** Visible emissions of fugitive dust discharging from the transfer points and conveyors shall not exceed 10% opacity.

**Crusher:** Visible emissions of fugitive dust discharging from the crusher shall not exceed 15% opacity.

Compliance Method: Compliance with the visible emission limitations identified above shall be determined in accordance with 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, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

- b. Emission Limitation:

**Screening and Transfer:** Screening and transfer total fugitive particulate emissions (PE) shall not exceed a 4.56 tons per year.

**Crusher:** Crusher total fugitive PE shall not exceed a 0.66 tons per year.

Compliance Method: Compliance with the PE tons per year emission limits shall be demonstrated by the use of emission factors found in AP-42, Compilation of Air Pollutant Emission Factors, Emission factors from AP-42 Chapter 13, 13.2.4 (1/95) and Chapter 11, Tables 11.19.2-2 (8/04).

P901 - Crushing & Screening

2,600,000 tons/yr max throughput, 425,000 tons/yr actual throughput

Maximum operation, hr/yr 8760

**PE EMISSIONS CALCULATION**

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Emission Point	AP-42 EF,lb,ton	PWR TONS/HR	ER,unc lb/hr	Overall % Control	ER,cont lb/hr	Potential tons	PWR TONS/YR	Actual tons
Screening	0.0315	300	9.45	90	0.945	4.13	425000	0.67
Primary Crushing	0.00504	300	1.512	90	0.1512	0.66	425000	0.11
Convey(in plant)	0.003	300	0.882	90	0.0882	0.39	425000	0.06
**Truck Unload	3.36E-05	300	0.01008	90	0.001008	0.0044	425000	0.00
**Truck Load	0.00021	300	0.063	90	0.0063	0.028	425000	0.00
<b>TOTAL PE</b>			<b>11.91</b>		<b>1.19</b>	<b>5.22</b>		<b>0.84</b>

Emission factors from AP-42, 13.2.4 (1/95)

\*\*Emission factors from AP-42, 11.19.2-2 (8/04)

Crushing	=	0.66 TPY
Screening/conveying	=	4.56 TPY
<b>TOTAL</b>	=	<b>5.22 TPY</b>

## c. Emission Limitation:

Emissions of NO<sub>x</sub> shall not exceed 5.4 lb/hr and 23.7 TPY.

## Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emissions factor from manufacturer's Tier 2 data (0.0106 lb/HP-hr) by the maximum rated capacity of P901 (510 HP).

Annual emissions shall be determined by multiplying the hourly NO<sub>x</sub> emission rate by 8760 hours per year and dividing by 2000 lbs/ton.

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

## d. Emissions Limitation:

Emissions of carbon monoxide (CO) shall not exceed 2.9 lbs/hr and 12.7 tons per

Emissions Unit ID: **P901**

year.

**Applicable Compliance Method:**

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emissions factor from manufacturer's Tier 2 data (0.0057 lb/HP-hr) by the maximum rated capacity of P901 (510 HP).

Annual emissions shall be determined by multiplying the hourly CO emission rate by 8760 hours per year and dividing by 2000 lbs/ton.

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

**e. Emissions Limitation:**

Emissions of SO<sub>2</sub> shall not exceed 1.1 lbs/hr and 4.9 tons per year.

**Applicable Compliance Method:**

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor from the manufacturer's (0.00205 lb/HP-hr) by the maximum rated capacity of P901 (510 HP).

Annual emissions shall be determined by multiplying the hourly SO<sub>2</sub> emission rate by 8760 hours per year and dividing by 2000 lbs/ton.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

**f. Emission Limitation:**

Particulate emissions (PE) shall not exceed 0.17 lbs/hr and 0.7 tons per year.

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Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor from manufacturer's Tier 2 data (0.00033 lb/HP-hr) by the maximum rated capacity of P901(510 HP).

Annual emissions shall be determined by multiplying the hourly PE emission rate by the total number of hours operated per year and dividing by 2000 lbs/ton.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g. Emission Limitation:

Emissions of OC shall not exceed 1.3 lbs/hr and 5.7 tons per year.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor from manufacturer's data (0.00251 lb/HP-hr) by the maximum rated capacity of P901 (510 HP).

Annual emissions shall be determined by multiplying the hourly VOC emission rate by 8760 hours per year and dividing by 2000 lbs/ton.

If required, organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

h. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60

Emissions Unit ID: **P901**

"Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002.

i. Emission Limitation:

PE shall not exceed 0.25 lb/million Btu of actual heat input.

Applicable Compliance Method:

The permittee cannot demonstrate compliance with this emission limitation based upon the current emission factor contained in AP-42, Table 3.3-1 (10/96). Note that Ohio EPA has revised the emission limitation specified in OAC rule 3745-17-11(B)(5)(a) based upon the currently applicable emission factor. The revised rule was adopted by the Director of Ohio EPA in December of 1997, and it will be submitted to the U.S. EPA as a proposed revision to the Ohio SIP for particulate matter. When the SIP revision is approved by the U.S. EPA, the 0.25 lb/million Btu actual heat input emission limitation will no longer be applicable.

j. Emission Limitation:

PE shall not exceed 0.310 lb/million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor of 0.31 lb/million Btu specified in AP-42, Table 3.3-1 (10/96).

k. Operational Limitation:

Sulfur content of fuel restricted to less than 0.5%, by weight

Applicable Compliance Method:

Compliance shall be based on recordkeeping as specified in Section C.5. of this permit.

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

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

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- b. The emission testing shall be conducted to demonstrate compliance with the visible particulate emission limitations for fugitive emissions for each crusher, each transfer point and each conveyor specified in Section A.2.f of this permit, in accordance with the requirements of 40 CFR Part 60.675.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s): for visible particulate emissions, Method 9 of 40 CFR 60, Appendix A.
- d. 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.

No 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 emissions 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 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.

**F. Miscellaneous Requirements**

Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing criteria are met. The portable emissions unit shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:

1. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
  - a. The portable emissions unit is equipped with the best available control technology for such portable emissions unit;
  - b. The portable emissions unit is operating pursuant to a currently effective PTI, permit to operate (PTO), or registration status;
  - c. The applicant has provided proper notice of intent to relocate the portable emissions unit to :
    - (i) Ohio EPA Southeast District Office or local air agency responsible for the permit(s) for the emissions unit and,
    - (ii) the appropriate Ohio EPA Southeast District Office or local air agency having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and;
  - d. In the Ohio EPA Southeast District Office's and the appropriate field office's (having jurisdiction over the new site) judgement, the proposed site is acceptable under OAC rule 3745-15-07.
2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(E) are met:
  - a. The portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
  - b. The portable emissions unit is equipped with best available technology;
  - c. The portable emission unit owner has identified the proposed site to Ohio EPA;
  - d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
  - e. A public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
  - f. The owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to

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move the portable emissions unit to the proposed site; and,

- g. The portable emissions unit owner has provided the Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

- 3. In order for the permitting Ohio EPA Southeast District Office and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the portable emissions unit with the Ohio EPA Southeast District Office, and/or the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA Southeast District Office, and/or the appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable emissions unit or add or delete certain terms and conditions as appropriate.

- 4. The permittee should be advised that when portable emissions unit(s) are located at a stationary source or at a site comprised of other portable emissions unit, potential emissions from the portable emissions unit(s) are included in the facility potential to emit calculations for Title V and PSD applicability.

The permittee shall include a potential to emit analysis of facility-wide emissions (including the portable emissions unit(s) for the proposed relocation in the "Notice of Intent to Relocate".

- 5. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the

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**Facility ID: 063495002**

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composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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.

**Operations, Property, and/or Equipment - (F002) - Aggregate Storage Piles (load-in, load-out, and wind erosion) with a maximum throughput of 2,600,000 tons per year and storage pile area equal to or less than 0.18 acres total for 300 TPH portable Aggregate processing plant**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Total fugitive Particulate emissions (PE) from storage piles shall not exceed 24.4 tons per year total.</p> <p>No visible PE except for 1 minute during any 60-minute period.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See Sections A.2.a. through A.2.f.).</p>
OAC rule 3745-17-07(B)(6)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08(B),(B)(6)	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 storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

- 1- 1500 ft<sup>2</sup> bulk rock storage pile (annual maximum 2,600,000 tons)
- 4 -100 ft<sup>2</sup> temporary sized limestone piles -belt off (total annual maximum 2,600,000 tons)
- 1- 1150 ft<sup>2</sup> #57 storage pile,
- 1- 1680 ft<sup>2</sup> #4 storage pile,

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- 1- 450 ft<sup>2</sup> fines storage pile,
- 1- 1150 ft<sup>2</sup> 1's & 2's storage pile, and,
- 1- 1150 ft<sup>2</sup> Grizzly belt-off storage pile (total annual maximum 2,600,000 tons)

- 2.b** 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 maintaining reduced drop height and watering 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 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.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 maintaining low pile height 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 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

**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>
ALL	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>
ALL	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>
ALL	Daily

- 4. No inspection shall be necessary for wind erosion from the surface of a storage pile

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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.

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 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 C.6.d. shall be kept separately for :

- (i) the load-in operations,
- (ii) the load-out operations,
- (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 quarterly deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required

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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. Emission Limitation:

No visible PE except for 1 minute during any 60-minute period.

Compliance Method:

If required, 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").

2. Emission Limitation:

Total fugitive Particulate emissions (PE) from storage piles shall not exceed 24.4 tons per year total.

## Compliance Method:

Compliance shall be based on the emission factors found in AP-42, Compilation of Air Pollutant Emission Factors, Chapter 13.2.4 (1/95), Equation 1, for load-in and load-out operations and BACM, Equation 2-12 (9/92), for wind erosion.

Initial compliance has been determined using inputs representing current conditions as follows:

**LOAD IN / LOAD OUT**

EMISSION FACTOR CALCULATION (from AP-42, Table 13.2.4 (1/95))

$$EF = k * 0.0032 * (U/5)^{1.3} / (M/2)^{1.4}$$

where:

k = 0.74 particle size multiplier for TSP  
 U = 10 mean wind speed, 1.3 to 15 miles per hour  
 M = 1.0 % moisture content of material, 0.25 to 4.8%

$$EF = 0.007278 \text{ pounds/ton}$$

3 load-in

3 load-out

Throughput = 2600000 tons per year throughput

Control efficiency = 80 % (Engineering estimate of the permittee)

**LOAD IN/LOAD OUT**

UNCONTROLLED PE EMISSIONS = 121.3 tons per year

CONTROLLED PE EMISSIONS = 24.26 tons per year

**WIND EROSION CALCULATION** (from BACM, Eq. 2-12 (9/92))

$$EF = 1.7 * (s/1.5) * ((365-p)/235) * (f/15)$$

where:

s = 10 silt content of stored material, wt. %  
 p = 130 days/yr with > 0.01 inch precipitation  
 f = 30 % of time wind speed exceeds 12 mph  
 A = 0.1717 total surface area of piles, acres

$$EF = 22.667 \text{ pounds/day/acre}$$

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Controls: 80 % efficient (Engineering estimate of the permittee)

## WIND EROSION

UNCONTROLLED PE EMISSIONS = 0.71 tons per year

CONTROLLED PE EMISSIONS = 0.14 tons per year

**TOTAL EMISSION SUMMARY**

Load-in/load-out = 24.26 TPY

Wind erosion = 0.14 TPY

Total emissions = 24.4 TPY

**F. Miscellaneous Requirements**

Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing criteria are met. The portable emissions unit shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:

1. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
  - a. The portable emissions unit is equipped with the best available control technology for such portable emissions unit;
  - b. The portable emissions unit is operating pursuant to a currently effective PTI, permit to operate (PTO), or registration status;
  - c. The applicant has provided proper notice of intent to relocate the portable emissions unit to :
    - (i) Ohio EPA Southeast District Office or local air agency responsible for the permit(s) for the emissions unit and,
    - (ii) the appropriate Ohio EPA Southeast District Office or local air agency having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and;

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- d. In the Ohio EPA Southeast District Office's and the appropriate field office's (having jurisdiction over the new site) judgement, the proposed site is acceptable under OAC rule 3745-15-07.
2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(E) are met:
    - a. The portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
    - b. The portable emissions unit is equipped with best available technology;
    - c. The portable emission unit owner has identified the proposed site to Ohio EPA;
    - d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
    - e. A public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
    - f. The owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to the proposed site; and,
    - g. The portable emissions unit owner has provided the Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

3. In order for the permitting Ohio EPA Southeast District Office and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the portable emissions unit with the Ohio EPA Southeast District Office, and/or the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA Southeast District Office, and/or the appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above

criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable emissions unit or add or delete certain terms and conditions as appropriate.

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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.

**Operations, Property, and/or Equipment - (F001) - 1.0 miles of Paved and Unpaved Roadways and Parking Areas for portable Aggregate processing plant consisting of less than 35,041 vehicle miles traveled per year.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Total fugitive particulate emissions (PE) from roadways shall not exceed 31.3 TPY.</p> <p>No visible PE except for 3 minute during any 60-minute period.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See Sections A.2.a through A.2.i.).</p>
OAC rule 3745-17-07(B)(4)&(5)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08(B)	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 paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways:

paved roadways or unpaved roadways which take on the characteristics of a paved roadway which serve the 300 tph portable aggregate processing facility. The permit application addressed all roadways as unpaved roadways (1.0 miles)

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to establish worse case emissions.

- 2.b** The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways:

1.0 miles of roadways total: all unpaved roadways, parking areas, material handling areas and the storage pile areas which serve the 300 tph portable aggregate processing facility.

- 2.c** The permittee shall employ best available control measures on all paved roadways and parking areas 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 treat the paved roadways and parking areas by sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The permittee shall employ best available control measures on all unpaved roadways and parking areas 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 treat the unpaved roadways and parking areas with chemical stabilization at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.f** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or

Emissions Unit ID: **F001**

parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

- 2.g** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.h** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.i** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 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 the roadways and parking areas in accordance with the following minimum frequencies:  
  
All Roadway and Parking areas - Daily
2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee shall maintain records of the following information:

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

The information required in C.3.d. 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. Emission Limitation:

No visible PE except for 3 minute during any 60-minute period.

Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of

Performance for New Stationary Sources" as such appendix existed on July 1, 2002, with the modifications found in OAC 3745-17-03(B)(4).

2. Emission Limitation:

Total fugitive particulate emissions (PE) from roadways shall not exceed 31.3 TPY.

Compliance Method:

The emission factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.2-4 (12/03 ) shall be utilized to determine compliance. Initial compliance has been determined using inputs representing Potential To Emit (PTE) conditions as follows:

UNPAVED AREAS

$$E = K (S/12)^a (W/3)^b ((365 - P)/365)$$

Where

E = size-specific emission factor (lb/VMT)

a = 0.7

b = 0.45

K = particle size multiplier = 4.9

S = silt content of road surface material % = 10

W = mean vehicle weight (tons) = 35 and 10 respectively

P = number of "wet" days with at least 0.01 inch of precipitation during period = 135

N = number of days in averaging period = 365

The emission factor calculation for paved roadways and parking areas in AP-42 section 13.2.1-3 (12/03) shall be utilized to determine compliance. Initial compliance has been determined using inputs representing Potential To Emit (PTE) conditions as follows:

PAVED AREAS

$$EF = ( K*(sL/2)^{0.65}*(W/3)^{1.5} ) - C(1-P/4N)$$

Where

E = size-specific emission factor (lb/VMT)

K = particle size multiplier = 0.082

sL = silt content of road surface material (g/m<sup>2</sup>) = 0.4g/m<sup>2</sup>

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W = mean vehicle weight (tons) = 35 and 10 tons respectively

C = 0.00047

P = number of 'wet' days with at least 0.01 inches of precipitation during the averaging period.

N = number of days in the averaging period (eg. 365 for annual, 91 for seasonal, 30 for monthly..)

Using the values in the above equations, the PE factors were used to calculate emissions as follows:

TOTALS

E (paved) = 6.0 lb/VMT

E (unpaved) = 8.21 and 4.67 lb/VMT, respectfully

Now, to calculate the actual emissions, multiply the emission factor by VMT/yr, to obtain the annual PE rates:

$$\text{Annual: PE (TPY)} = \frac{\text{paved } (6.0 \text{ lb/VMT}) (0 \text{ VMT/yr}) (1-0.75) / (2000\text{lbs/ton}) + \text{unpaved } (8.21 \text{ \& } 4.67 \text{ lb/VMT}) (24528 \text{ \& } 10512 \text{ VMT/yr}) (1-0.75) / (2000\text{lbs/ton})}{\text{Total PE (TPY)} = 31.3}$$

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**F. Miscellaneous Requirements**

Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing criteria are met. The portable emissions unit shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:

1. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
  - a. The portable emissions unit is equipped with the best available control technology for such portable emissions unit;
  - b. The portable emissions unit is operating pursuant to a currently effective PTI, permit to operate (PTO), or registration status;
  - c. The applicant has provided proper notice of intent to relocate the portable emissions unit to :
    - (i) Ohio EPA Southeast District Office or local air agency responsible for the permit(s) for the emissions unit and,
    - (ii) the appropriate Ohio EPA Southeast District Office or local air agency having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and;
  - d. In the Ohio EPA Southeast District Office's and the appropriate field office's (having jurisdiction over the new site) judgement, the proposed site is acceptable under OAC rule 3745-15-07.
2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(E) are met:
  - a. The portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
  - b. The portable emissions unit is equipped with best available technology;
  - c. The portable emission unit owner has identified the proposed site to Ohio EPA;

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- d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
- e. A public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
- f. The owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to the proposed site; and,
- g. The portable emissions unit owner has provided the Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

- 3. In order for the permitting Ohio EPA Southeast District Office and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the portable emissions unit with the Ohio EPA Southeast District Office, and/or the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA Southeast District Office, and/or the appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable emissions unit or add or delete certain terms and conditions as appropriate.