



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
WASHINGTON COUNTY**

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

Application No: 06-07875

Fac ID: 0684000001

DATE: 8/4/2005

Reed Minerals Plant 56
Mark Mummert
350 Poplar Church Rd.
Camp Hill, PA 17011

Enclosed please find an 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
309 South Fourth Street, Room 222
Columbus, Ohio 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: 8/4/2005
Effective Date: 8/4/2005**

FINAL PERMIT TO INSTALL 06-07875

Application Number: 06-07875
Facility ID: 0684000001
Permit Fee: **\$600**
Name of Facility: Reed Minerals Plant 56
Person to Contact: Mark Mummert
Address: 350 Poplar Church Rd.
Camp Hill, PA 17011

Location of proposed air contaminant source(s) [emissions unit(s)]:
**Washington Co Rd 32
Waterford, Ohio**

Description of proposed emissions unit(s):
Chapter 31 modification to add a limit on the operating hours.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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 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

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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

Pollutant	Tons Per Year
NOx	2.8
CO	2.4
PE	9.2

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P901 - 60 TPH Coal Slag Drying Plant with Baghouse (Chapter 31 Modification)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)(3) OAC rule 3745-17-11(B)(1) 40 CFR 60 Subpart UUU
This permit supersedes PTI # 06-06632, issued 11/12/04, for this emission unit.	OAC rule 3745-31-05(C)	OAC rule 3745-21-08(B) OAC rule 3745-23-06(B)

Applicable Emissions
Limitations/Control Measures

See A.1.2.c

See A.1.2.d

Particulate emissions from the baghouse exhaust stack shall not exceed 0.012 grain per dry standard cubic foot of exhaust gases.

Visible particulate emissions from the baghouse exhaust stack shall not exceed 10% opacity as a six minute average.

There shall be no visible fugitive particulate emissions.

Nitrogen oxide (NOx) emissions shall not exceed 1.61 lb/hr and 2.8 tons per year.

Carbon monoxide (CO) emissions shall not exceed 1.35 lb/hr and 2.4 tons per year.

Particulate emissions from the baghouse stack shall not exceed 9.2 tons/yr as a rolling, 12-month summation.

See A.1.2.a

See A.1.2.a

See A.1.2.a

See A.1.2.a. and b

2. Additional Terms and Conditions

- 2.a** The requirements of these applicable rules are equivalent to or less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b** The application and enforcement of the provisions of the New Source Performance Standards (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.
- 2.c** 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.d** 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 rule 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.

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

2. The permittee shall operate the baghouse at all times when this emissions unit is in operation.
3. The maximum number of operating hours for emissions unit P901 shall not exceed 3,500 hours as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

<u>Month(s)</u>	<u>Maximum Cumulative Operating Hours</u>
1-1	744
1-2	1,488
1-3	2,232
1-4	2,976
1-5	3,500
1-6	3,500
1-7	3,500
1-8	3,500
1-9	3,500
1-10	3,500
1-11	3,500
1-12	3,500

After the first 12 calendar months of operation following the startup of emissions unit P901, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

C. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
 - b. the total duration of any visible fugitive emission incident; and
 - c. any corrective actions taken to eliminate the visible fugitive emissions.
3. The permittee shall have a certified visible emissions observer measure and record three 6-minute averages of the opacity of visible emissions from the baghouse exhaust stack to the atmosphere each day of operation in accordance with Method 9 of Appendix A of 40CFR, Part 60.
 4. The permittee shall maintain monthly records of the following information:
 - a. The hours of operation for P901 for each month;
 - b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative hours of operation, calculated by adding the current month's operating hours to the operating hours for each calendar month since the issuance of this permit; and
 - c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the hours of operation, calculated by adding the current month's operating hours to the operating hours for the preceding eleven calendar months.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the plant and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit semiannual written reports of any exceedances of all 6-minute periods during which the average opacity from the baghouse exhaust stack is greater than 10 percent opacity. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the

previous 6-month period.

4. 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 163669
Columbus, Ohio 43216-3669

and

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

6. The permittee shall submit semiannual deviation (excursion) reports which identify the following:
 - a. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation;
 - b. Any exceedance of the rolling, 12-month hours of operation limitation.

These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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Emissions Unit ID: P901

E. Testing Requirements

1. **Emission Limitation**
Visible particulate emissions from the baghouse exhaust stack shall not exceed 10% opacity.

Applicable Compliance Method

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" if required.

2. **Emission Limitation**
Particulate emissions from the baghouse exhaust stack shall not exceed 0.012 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method

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", if required.

3. Emission Limitation

Particulate emissions from the baghouse stack shall not exceed 9.2 tons/yr as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the hourly particulate emission rate by the total number of hours operated per rolling, 12-month period, as recorded in Section C.4.c, and dividing by 2000 lbs/ton.

4. Emission Limitation

Nitrogen oxide (NO_x) emissions shall not exceed 1.61 lb/hr and 2.8 tons per year.

Applicable Compliance Methods

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 (7/98, Table 1.4-1.) emission factor (100 lb NO_x /MMcf) by the maximum fuel use rate (0.0161 MMcf/hr).

Compliance with the annual limitation shall be demonstrated by multiplying the maximum hourly emission rate (1.61 lb NO_x/hr) by 3,500 hours of operation and dividing by 2000 lb/ton.

5. Emission Limitation

Carbon monoxide (CO) emissions shall not exceed 1.35 lb/hr and 2.4 tons per year.

Applicable Compliance Methods

Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 (7/98, Table 1.4-1.) emission factor (84 lb CO/MMcf) by the maximum fuel use rate (0.0161 MMcf/hr).

Compliance with the annual limitation shall be demonstrated by multiplying the maximum hourly emission rate (1.35 lb CO/hr) by 3,500 hours of operation and dividing by 2000 lb/ton.

F. Miscellaneous Requirements

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Emissions Unit ID: **P901**

None.