

Facility ID: 0616940020 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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

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

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

Facility ID: 0616940020 Emissions Unit ID: F001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - 0.5 mile Unpaved roadways and parking areas serving the portable railcar loading facility with a maximum of 10,000 vehicle miles traveled per year.	OAC rule 3745-31-05(A)(3) (PTI # 06-08259 issued 1/23/2007)	Total fugitive particulate emissions (PE) shall not exceed 4.30 TPY. No visible PE except for 3 minutes during any 60-minute period.
	OAC rule 3745-17-07(B)(5) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See Sections A.2.a through A.2.g.). 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) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	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

- (a) The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways:

0.5 miles of roadways total: all unpaved roadways, parking areas, material handling areas and the storage pile areas which serve the portable railcar coal loading facility.

A - Entrance / exit access roadway including material handling (96,520 ft2 (40' x 2640' 0.5 mi.))
 B - Equipment parking area (1250 ft2)
 C - Equipment parking area (1125 ft2)
 D - Scale House parking area (300 ft2)

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 by watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

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 an 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.

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 using appropriate dust control measures for paved roadway or parking areas. Any unpaved roadway or parking area that takes the characteristics of a paved surface 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 of no visible emissions except for one minute during any 60-minute period.

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.

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.

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

1. None

C. Monitoring and/or Record Keeping 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:

Roadway and Parking areas identification minimum load-in inspection frequency

ALL 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:
 - 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;
 - the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - the dates the control measures were implemented; and
 - 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:
 - 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
 - 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 emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

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 22 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).

Emission Limitation:

Total fugitive particulate emissions (PE) shall not exceed 4.30 TPY.

Compliance Method:

The emission factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.2 (11/06) 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) = 39

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

N = number of days in averaging period = 365

Total PE (unpaved) = 8.61 lb/VMT

Now, to calculate the actual emissions, multiply the emission factor by VMT/yr and control efficiency of 95% per roadway, to obtain the annual PE rates:

Annual: PE (TPY) = unpaved (8.61 lb/VMT) (10000 VMT/yr) (1-0.90) / (2000lbs/ton)

Total PE (TPY) = 4.30

F. Miscellaneous Requirements

1. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p), the permittee of a portable source may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable source shall meet one of the two following options in order to qualify for this PTI exemption for the new location:
 - Option 1. The permittee has demonstrated that the portable source meets all requirements specified in OAC rule 3745-31-03(A)(1)(p)(i), including:
 - i. the portable source was issued a PTI and continues to comply with any applicable BAT requirements;
 - ii. the portable source is operating pursuant to a currently effective permit to install and/or any applicable permit to operate (PTO);
 - iii. the applicant has provided proper notice of the intent to relocate the portable source to the (1.) Ohio EPA District Office or local air agency responsible for the permit(s) for the source and (2.) the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and
 - iv. the director has issued a notice stating that in the director's judgment, the proposed site is acceptable under rule 3745-15-07 of the Administrative Code.

Option 2. The permittee has demonstrated that the portable source meets all requirements specified in OAC rules 3745-31-03(A)(1)(p)(ii) and 3745-31-05(E), including:

- i. the portable source is currently in compliance with the currently effective PTI and/or any applicable PTO;
- ii. the portable source was issued a PTI and, where BAT requirements were defined in that PTI, the portable source continues to comply with any applicable BAT requirements;
- iii. the portable source owner has identified the proposed site to Ohio EPA;
- iv. Ohio EPA has determined that the portable source, at the proposed site, will have an acceptable environmental impact;
- v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
- vi. the owner of the proposed site has provided the portable source owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable source to this proposed site; and
- vii. the portable source owner has provided 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.

In order for the permitting Ohio EPA District Office or local air agency 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 source must file a " Notice of Intent to Relocate" within the specified time frame (30 or 15 days), prior to the relocation of the portable source with the Ohio EPA District Office or local air agency responsible for the permits for the source and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA District Office or local air agency responsible for the permits for the portable source, and/or appropriate Ohio EPA District Office or local air agency 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 portable source 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 sources or add or delete certain terms and conditions as appropriate.