

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: F002 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>
F002 - Coal storage pile for portable railcar coal loading facility, including load-in and load-out and wind erosion for maximum annual throughput of 421,000 tons/year and a maximum storage pile surface area of 1 Acre.	OAC rule 3745-31-05(A)(3) (PTI # 06-08259 issued 1/23/2007)	Total fugitive particulate emissions (PE) shall not exceed 0.75 TPY. No visible PE except for one minute during any 60-minute period.
	OAC rule 3745-17-07(B) (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.f) 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 storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

1 - 1 Acre coal storage pile (maximum annual throughput of 421,000 tons)
 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 moisture content to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
 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.
 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 moisture content to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
 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.
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

1. None

C. Monitoring and/or Record Keeping 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:
storage pile identification minimum load-in inspection frequency

Coal Storage Pile 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:

storage pile identification minimum load-out inspection frequency

Coal Storage Pile 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:

storage pile identification minimum wind erosion inspection frequency

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

Total fugitive particulate emissions (PE) shall not exceed 0.75 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 (11/06), Equation 1, for load-in and load-out operations and Control of Open Fugitive Dust Sources (9/88), 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 (11/06))

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

where:

k = 0.74 particle size multiplier for TSP
 U = 9 mean wind speed, 1.3 to 15 miles per hour
 M = 4.8 % moisture content of material, 0.25 to 4.8%

$$EF = 0.001493 \text{ pounds/ton}$$

1 load-in
 1 load-out
 Throughput = 421,000 tons per year
 Control efficiency = 70 % (moisture control Engineering estimate of the permittee)

LOAD IN/LOAD OUT

UNCONTROLLED PE EMISSIONS = 0.628 tons per year
 CONTROLLED PE EMISSIONS = 0.188 tons per year

WIND EROSION CALCULATION (from Control of Open Fugitive Dust Sources (9/88))

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

where:

s = 4.6 silt content of stored material, wt. %
 p = 135 days/yr with > 0.01 inch precipitation
 f = 30 % of time wind speed exceeds 12 mph
 A = 1.0 total surface area of piles, acres

$$EF = 10.20 \text{ pounds/day/acre}$$

Controls: 70 % efficient (moisture control Engineering estimate of the permittee)

WIND EROSION

UNCONTROLLED PE EMISSIONS = 1.86 tons per year
 CONTROLLED PE EMISSIONS = 0.558 tons per year

TOTAL EMISSION SUMMARY

Load-in/load-out = 0.188 TPY

Wind erosion = 0.558 TPY

Total emissions = 0.75 TPY

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.