



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

3/5/2013

Certified Mail

Jan Barnes
Transflo Terminal Services, Inc.
500 Water Street - J975
Jacksonville, FL 32202

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0448011937
Permit Number: P0112697
Permit Type: Initial Installation
County: Lucas

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
TDES; Michigan; Indiana; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

TRANSFLO Terminal Services, Inc. operates a material transloading facility at 1601 Miami Street in Lucas County. This facility transloads bulk quantities of dry and liquid materials between railcars and trucks. This facility has been considered to be exempt from air pollution permitting requirements as all operations have been considered to qualify for the de minimis exemption of OAC rule 3745-15-05.

TRANSFLO proposes to modify their existing liquid materials handling operations to include the receipt and distribution of unit train quantities (3,000,000 gallons per day) of crude oil. TRANSFLO has requested a synthetic minor permit restriction to the equivalent of 811,200,000 gallons of crude oil (27,000 cars/year) to avoid potential Title V permit applicability.

An operating permit is also to be issued for the existing dry handling operations to avoid operational restrictions imposed by meeting the requirements of an OAC 3745-31-05(D) compliance demonstration.

3. Facility Emissions and Attainment Status:

The limitations of this permit will formalize TRANSFLO status as a minor source of all pollutants with the potential to emit of 53.0 tons per year as PM₁₀, 61.1 tons per year as VOC and 4.6 tons per year as combined HAPs. Lucas County is in attainment status for all criteria pollutants.

4. Source Emissions:

P801 Transloading of Liquids: 61.1 tons per year as VOC and 4.6 tons per year as combined HAPs
P901 - Transloading of Solid Materials: 53.0 tons per year as PM₁₀

5. Conclusion:

While this source may be considered controversial due to a potential for additional localized noise and potential traffic congestion caused by the receipt of unit train size shipments, these issues are not part of the air pollution permitting review process at this stage. The restrictions included in this permit meet the requirement established by the authority of the Ohio EPA for an air pollution source. We would recommend issuance of this permit as a draft FEPTIO to make the synthetic minor emission limitation federally enforceable.

6. Please provide additional notes or comments as necessary:

Please see discussion below.



Permit Strategy Write-Up
TRANSFLO Terminal Services, Inc.
Permit Number: P0112697
Facility ID: 0448011937

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PM10	53.0 (PTE)
VOC	61.1
HAPs	4.6



P801 Transloading of Liquids

TRANSFLO submitted calculations justifying an annual facility-wide permit emission limitation for all types of liquids transferred of 31.2 tons per year as VOC. They proposed as BAT a vapor balance system for transfer operations, utilizing up to 3 portable pumping stations, each with a 500 gpm capacity for crude oil (7.57 psia) and numerous additional pumps of 150, 300 and 500 gpm capacity for other liquids. They further request that the vapor balance system be required by permit for only such liquids as exceed a vapor pressure of 0.9 psia.

The state is not specific in defining the number of permits to be issued for a transloading operation. Since the existing transloading of dry materials has been considered to be a de minimis operation, and the process is easily identifiable as being separate from the transloading of liquids, we choose to consider it a separate emissions unit, and pending review of the de minimis calculations, we propose to issue no permit for the existing dry transloading operation.

TRANSFLO stated that the existing operations are de minimis and only the addition of the crude unloading operations creates a requirement for issuance of an operating permit. For purposes of this permit review, only the increase in emissions due to the addition of the crude oil handling need be evaluated. Since de minimis status is not available to similar sources with a combined rate of emissions exceeding 25 tpy, the liquid loading permit will only be broken into two emissions units if doing so simplifies the compliance demonstration for the company.

Crude oil transloading

TRANSFLO has identified a separate area to be dedicated to the crude unloading operations. Although the pumps may be considered independent operations and portable within the confines of the crude oil unloading area, we will treat the operation as one emissions unit consistent with determinations routinely made for petroleum load rack operations.

TRANSFLO submitted emissions estimates based on a maximum hourly crude oil flow rate of 360,000 gallons (12 cars/hr), and an annual restricted throughput of 811,200,000 gallons (27,000 cars/year). Anticipated actual operations are proposed to be more conservative at 5 to 22 cars per day, however operations may expand should the demand support higher throughput levels.

AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2 dated 6/08, equation 1 presents the following formula for estimating uncontrolled emissions from the loading of petroleum liquids:

$$L_L = 12.46 (SPM)/T$$

Where:

L_L = loading loss, pound of VOC /1000 gallons of liquid loaded

S = saturation factor = 1.00 for dedicated vapor balance service submerged loading (Table 5.2-1)

P = true vapor pressure of liquid loaded, psia = 7.57 psia (worst case)

M = molecular weight of vapors, pounds per pound mole



T = temperature of liquid loaded, °R = 535.09°R as the maximum (July) monthly average using U.S. EPA Tanks 4.09

TRANSFLO submitted an estimate of the crude oil component concentration (as Table 4b of the permit application), and utilizing the formula above, estimated the uncontrolled emissions at 360,000 gallons per hour as 1676 pounds of VOC per hour and of HAPs as 62.13 pounds per hour, and at an annual restricted throughput of 811,200,000 gallons as 1092 tons VOC per year and of HAPs as 70.0 tons per year. AP-42, table 5.7 presents emissions estimates for the passive operation of a Stage I vapor balance system as 7.3 lb/1000 gal uncontrolled and 0.3 lb/1000 gal controlled. These estimates support a determination of control efficiency for a similar operation as $(7.3 - 0.3) \div 7.3 = 95.9\%$. We will use 95% in our calculations. The company submitted calculations based on control using a negative pressure collection system with a 98.7% capture efficiency.

Our process emissions estimates become:

hourly; 1676 lb VOC/hr $(1-0.95) = 83.8$ lb VOC/hr
62.13 lb HAP/hr $(1-0.95) = 3.1$ lb HAP/hr
annual; 1092 tons VOC/yr $(1-0.95) = 54.6$ tons VOC/yr
70.0 tons HAP/yr $(1-0.95) = 3.5$ ton HAP/yr

At these levels of emissions (<80 tpy VOC) a formal BAT review will not be required. Our web review indicated that a recent, larger, similar source was issued a permit in Region 8 (Van Hook Crude Terminal Permit #SMNSR-TAT-000044-2012.001). They had available storage tank capacity and operated a standard load rack facility with vapor control, but sometimes loaded from truck directly to rail. Their BAT included a requirement to install a 98% effective control device. With overall control of $((1-0.987) + (0.987)(1-0.98)) = 96.7\%$ calculates to be the overall control efficiency.

Had TRANSFLO proposed control by an active control system (vapor collection on the truck loading and a 98% effective control device as commonly utilized for petroleum load racks) potential emissions might be reduced to:

annual; 1092 tons VOC/yr $(1-0.967) = 36.0$ tons VOC/yr

The difference in the means of control is not considered to result in a substantial reduction in emissions. It is not believed that an active control system can be justified on a BAT cost/benefit basis, and due to the portability of the unloading equipment, an active control system would cause a substantial change in the flexibility of the use of the unloading equipment.

Engineering Guide #69 establishes no state modeling requirements for VOC. Ohio EPA has determined that for material transfer operations, an air toxic pollutant evaluation is not necessary (EG#70). Our emissions estimates based on 95% control and a maximum crude oil flow rate of 360,000 gallons per hour and 811,200,000 gallons per year are 83.8 lb VOC/hr, 3.1 lb HAP /hr, 54.6 tons VOC/yr and 3.5 tons HAP/yr. After the institution of SB265, only one emissions limitation can be set. BAT will be set as a rolling ton per year limitation.



Transloading of other liquids

TRANSFLO submitted calculations justifying an annual facility-wide permit emission limitation for all types of liquids transferred. They proposed as BAT a vapor balanced approach for all liquids which exceed a vapor pressure of 0.9 psia. As discussed above AP-42 credits this “Stage I” style vapor balance system with a control efficiency of 95.9%. We will use 95% in our calculations. The company submitted calculations based on actual material throughputs from December 1, 2011 through November 30, 2012. TRANSFLO indicated that a custom environmental database is utilized currently to track actual emissions.

TRANSFLO submitted an emissions summary indicating actual emissions of 0.11 tpy VOC and 0.0001 tpy HAPs for the subject period. At a combined maximum flow of 169,500,000 gallons per year, TRANSFLO extrapolates potential uncontrolled emissions of 300.73 lb/hr and 128.95 tpy VOC, and 80.08 lb/hr and 21.91 tpy HAPs (Tables 7 and 7b).

Utilizing a control efficiency of 95%, we would establish potential to emit at:

300.73 #/hr VOC (1-95%) = 15.04#/hr VOC
 128.95 tpy VOC (1-95%) = 6.45 tpy VOC
 80.08 #/hr HAPs (1-95%) = 4.00 #/hr HAPs and
 21.91 tpy HAPs (1-95%) = 1.10 tpy HAPs

After the institution of SB265, only one emissions limitation can be set. BAT will be set as a rolling ton per year limitation.

All liquid transloading

Based on recent guidance from Ohio EPA, it appears that the simplest means of demonstrating compliance with the allowable emission above would combine the facility-wide total emissions from the loading of all liquids. A single emission limitation of 54.6 + 6.5 = 61.1 tpy of VOC and 3.5 + 1.1 = 4.6 tpy of HAPs will be set with compliance demonstrated by formula as follows:

The maximum annual throughput of liquids transloaded at this emissions unit shall be limited by the following formulae, calculated as rolling, 12-month summations:

$$61.1 \text{ tons VOC} \geq [0.05 \sum_{i=1}^n (Q_i)(VOC_i) + \sum_{j=1}^n (Q_j)(VOC_j)] \div 2000 \text{ pounds/ton}$$

And,

$$4.6 \text{ tons HAP} \geq [0.05 \sum_{i=1}^n (Q_i)(HAP_i) + \sum_{j=1}^n (Q_j)(HAP_j)] \div 2000 \text{ pounds/ton}$$

Where:

Q_i = volume of material “i” loaded while utilizing vapor balance control, gallons
 Q_j = volume of material “j” loaded utilizing no control, gallons



VOC_i = the uncontrolled mass of VOC (emitted) per volume of liquid “i” loaded while utilizing vapor balance control, pounds per gallon

VOC_j = the mass of VOC (emitted) per volume of liquid “j” loaded utilizing no control, pounds per gallon

HAP_i = the uncontrolled mass of combined HAPs (emitted) per volume of liquid “i” loaded while utilizing vapor balance control, pounds per gallon

HAP_j = the mass of combined HAPS (emitted) per volume of liquid “j” loaded utilizing no control, pounds per gallon

P901 - Transloading of Solid Materials

TRANSFLO unloads a wide variety of material based on customer’s needs. Unloading is done by pneumatic conveying with controls, or by covered conveyors with integral fabric filtration. In the solids section, Table 2 of Appendix 4 of the permit application, TRANSFLO estimates the actual emissions for the most recent 12-month period to be 0.096 tpy as PM10, and full potential to emit as 0.807 tpy as PM10 from pneumatic sources and 0.0129 tpy as PM10 actual for bulk handling. At these rates, the dry material handling processes at this facility may be expected to qualify for a permit exemption under the authority of OAC rule 3745-15-05(D).

TRANSFLO identifies five specific systems utilized for material unloading: 3-40 tph pneumatic conveying systems and 2-50 tph belt conveying systems. A worst case (for lime handling) emissions factor of 0.03766 lb/ton (1.51 lb/hr) is given for each pneumatic conveying process and a maximum emissions rate (for lime handling) of 3.79 lb/hr is calculated for each conveyor. At these rates, compliance with the de minimis permit exemption of 10 lb/day from each operation would severely restrict the flexibility of the unloading operations, although actual emissions are reported to be quite small, and if requested, we would not object to the company maintaining records adequate to demonstrate compliance with the permitting exemption of OAC rule 3745-15-05(D)..

Unrestricted PTE may be established at:

$$3 \text{ systems (1.51 lb/hr)} + 2 \text{ systems (3.79 lb/hr)} = 12.11 \text{ lb PM10/hr}$$
$$12.11 \text{ lb/hr (8760 hr/yr)} \div 2000 \text{ lb/ton} = 53.0 \text{ tpy as PM10}$$

Engineering Guide #69 states that for minor source state permit modeling, non-process fugitive sources such as material transfer operations are not modeled. While the company states that actual emissions are far below this level of emissions, it is not believed that operational restrictions would provide any benefit to the company. Therefore: based on the assumptions used by TRANSFLO in their submitted calculations, for the conveyor system utilizing 90% capture of fugitive emissions (which we would previously established as equivalent to 10% opacity), and a company supplied 0.01 gr/dscf (based on manufacturer’s guarantees) from the control device, (which we have previously established as equivalent to 0% opacity) the combined emissions from all sources will be estimated at a maximum of 12.1 lb PM10/hr and 53.0 tons PM10/yr.

After the institution of SB265, in compliance with the OEPA draft guidance, BAT should be set as gr/dscf for the control devices and tons per 12-month rolling period for the fugitive emissions. With



an individual flow rate of 2000 cfm and an individual stack emission level of 1.51 lb/hr, grain loading for the pneumatic conveying system becomes:

$$(1.51 \text{ lb combined/hr})(7000 \text{ gr/lb})(1 \text{ hr}/60 \text{ min}) \div 2000 \text{ dscf/min} = 0.09 \text{ gr/dscf as PM}_{10}$$

While BAT cannot be set at a level less stringent than RACT, and OAC rule 3745-17-08(B)(3)(b) establishes RACT as 0.030 gr/dscf as PE; pneumatic conveying is not a fugitive dust source and 17-08 does not apply to this emissions source. As a practical matter, pneumatic conveying may be expected to generate a much higher particulate grain loading to the baghouse than a typical fugitive dust source, and a factor of 3x the 17-08 emissions rate from does not seem unreasonable as BAT.

From the discussion above, the fugitive emissions from each conveyor may be established as 3.79 lb/hr (combined stack and fugitive) – 0.17 lb/hr (stack from company submitted Table 3) = 3.62 lb PM₁₀/hr fugitive each for conveyor.

$$3.62 \text{ lb PM}_{10}/\text{hr fugitive each for conveyor (2 conveyors)}(8760 \text{ hr/yr}(1 \text{ ton}/2000 \text{ lb}) = 31.7 \text{ ton/yr PM}_{10}$$

Applicability of OAC rule 3745-17-11(B)(1) requires the review of PE limitations. For purposes of "Table I" in the appendix to this rule, process weight per hour is the total weight of all materials introduced into any single, specific process (at its maximum capacity) that may cause any emission of particulate matter. This emissions unit is comprised of 3-40 tph pneumatic conveying systems and 2-50 tph belt conveying systems.

$$3 (42\#/hr) + 2 (44.6\#/hr) = 215.2 \text{ lb/hr as PE (from OAC rule 3745-17-11, Table I)}$$

For purposes of "Figure II" in the appendix to this rule, the total uncontrolled mass rate of emission from all similar process units at a plant is used for determining the maximum allowable mass rate of particulate emissions. Uncontrolled mass rate of emissions is:

$$(0.74\text{PE} \div 0.36\text{PM}_{10})(4.484 \text{ \#/hr}) + (0.17 \div (1-99.4\% \text{ control})) = 67.5 \text{ \#/hr PE uncontrolled (from application)}$$

$$A = 0.5782 U^{0.6456} = 8.77 \text{ lb PE/hr}$$

Therefore a 17-11 emissions limitation of 8.77 lb PE/hr will be established.

B00x – small boilers

Transco currently has on site diesel fired boilers of 2.1 and 1.68 mmBtu/hr capacity, and a natural gas/fuel oil fired boiler of 2.94 mmBtu/hr capacity. OAC rule 3745-31-03(A)(1)(a) exempts from the requirements to obtain an air pollution permit, any fossil fuel-fired boilers less than ten million British thermal units per hour burning only natural gas and distillate oil (with less than or equal to 0.5 per cent by weight sulfur).



Permit Strategy Write-Up
TRANSFLO Terminal Services, Inc.
Permit Number: P0112697
Facility ID: 0448011937

Transco has identified these boilers as being exempted from permitting requirements by 3745-31-03(A)(1)(a). They acknowledge the applicability of 40 CFR Part 63, Subpart JJJJJJ to these units and have indicated that they maintain compliance with this applicable regulation.

No permits will be issued for these sources.

PUBLIC NOTICE

3/5/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Transflo Terminal Services, Inc.

1601 Miami Street,

Toledo, OH 43605

Lucas County

FACILITY DESC.: Support Activities for Rail Transportation

PERMIT #: P0112697

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation permit for transloading operations for liquids and solids, primarily between railcars and trucks

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Mary Lehman-Schmidt, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Transflo Terminal Services, Inc.**

Facility ID:	0448011937
Permit Number:	P0112697
Permit Type:	Initial Installation
Issued:	3/5/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



**Division of Air Pollution Control
Permit-to-Install and Operate**
for
Transflo Terminal Services, Inc.

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Draft Permit-to-Install and Operate

Transflo Terminal Services, Inc.

Permit Number: P0112697

Facility ID: 0448011937

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448011937
Application Number(s): A0046779
Permit Number: P0112697
Permit Description: Initial installation permit for transloading operations for liquids and solids, primarily between railcars and trucks
Permit Type: Initial Installation
Permit Fee: \$2,500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/5/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Transflo Terminal Services, Inc.
1601 Miami Street
Toledo, OH 43605

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Draft Permit-to-Install and Operate

Transflo Terminal Services, Inc.

Permit Number: P0112697

Facility ID: 0448011937

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0112697

Permit Description: Initial installation permit for transloading operations for liquids and solids, primarily between railcars and trucks

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P801
Company Equipment ID:	liquid pumps
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P901
Company Equipment ID:	Solid material transfer operations
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

Transflo Terminal Services, Inc.

Permit Number: P0112697

Facility ID: 0448011937

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



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B. Facility-Wide Terms and Conditions



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Facility ID: 0448011937

Effective Date: To be entered upon final issuance

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



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C. Emissions Unit Terms and Conditions



1. P801, liquid pumps

Operations, Property and/or Equipment Description:

Liquid transloading operations between railcars and trucks

a) 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. b)(1)a., b)(2)a and b)(2)b., d)(1) through d)(3) and e)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p>The emissions of volatile organic compounds from this emissions unit shall not exceed 61.1 tons as a rolling, 12-month summation.</p> <p>The combined emissions of all hazardous air pollutants from this emissions unit shall not exceed 4.6 tons as a rolling, 12-month summation.</p> <p>See b)(2)a. and b)(2)b.</p>

(2) Additional Terms and Conditions

a. The permittee has committed to a utilizing a vapor balance system capable of a 95% overall control efficiency during the transfer of all materials exceeding a vapor pressure of 0.9 psia. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.



- b. The maximum annual throughput of all liquid materials transloaded in this emissions unit shall be limited by the following formulae, calculated as a rolling, 12-month summation:

$$61.1 \text{ tons VOC} \geq [0.05 \sum_{i=1}^n (Q_i)(VOC_i) + \sum_{j=1}^n (Q_j)(VOC_j)] \div 2000 \text{ pounds/ton}$$

And

$$4.6 \text{ tons HAP} \geq [0.05 \sum_{i=1}^n (Q_i)(HAP_i) + \sum_{j=1}^n (Q_j)(HAP_j)] \div 2000 \text{ pounds/ton}$$

Where:

Q_i = volume of material "i" loaded while utilizing vapor balance control, in thousands of gallons

Q_j = volume of material "j" loaded utilizing no control, in thousands of gallons

VOC_i = the uncontrolled mass of VOC (emitted) per volume of liquid "i" loaded while utilizing vapor balance control, pounds per 1000 gallons

VOC_j = the uncontrolled mass of VOC (emitted) per volume of liquid "j" loaded utilizing no control, pounds per 1000 gallons

HAP_i = the uncontrolled mass of combined HAPs (emitted) per volume of liquid "i" loaded while utilizing vapor balance control, pounds per 1000 gallons

HAP_j = the uncontrolled mass of combined HAPS (emitted) per volume of liquid "j" loaded utilizing no control, pounds per 1000 gallons

c) Operational Restrictions

- (1) The transfer of all materials exceeding a vapor pressure of 0.9 psia shall utilize a vapor balance system whereby during the transfer of the materials to any delivery vessel the vapors displaced from the delivery vessel shall be processed by a vapor balance system with a vapor tight vapor line from the delivery vessel to the vessel being unloaded. The system shall be equipped with a means to ensure that the vapor line is connected before materials can be transferred, and it shall be designed and operated to route at least 95 percent by weight of the VOC in the displaced vapors to the vessel being unloaded.
- (2) During the transfer of all materials exceeding a vapor pressure of 0.9 psia, and to the extent practicable for the transfer of all other materials; the permittee shall maintain the vessel being unloaded, delivery vessels, and transfer lines using the following operational practices:



- a. all loading lines, unloading lines, and vapor lines shall be equipped with fittings which are vapor tight,
- b. the vapor balance or vapor control system shall be kept in good working order and shall be used at all times,
- c. the delivery vessel hatches shall be closed at all times during the loading of the delivery vessel,
- d. there shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers,
- e. there shall be no leaks in the vapor and liquid lines during the transfer of materials,
- f. the permittee shall perform an inbound inspection of the railcars and trucks, assuring they have a current Department of Transportation certification for the receiving vessel, and,
- g. the permittee shall not allow transloaded materials to be spilled, discarded in sewers, stored in open containers, or handled in any other manner that would result in evaporation.

d) Monitoring and/or Recordkeeping Requirements

- (1) For purposes of determining the uncontrolled mass of VOC (emitted) per volume of each liquid material transloaded in this emissions unit (VOC_i or VOC_j), the permittee shall monitor and record for each material transloaded:
 - a. the control method utilized; vapor balanced loading, uncontrolled submerged loading, or uncontrolled splash loading,
 - b. the true vapor pressure of liquid loaded, in psia, and
 - c. the molecular weight of vapors, in pounds per pound mole.
- (2) For purposes of compliance with the annual maximum throughput of all liquid materials transloaded in this emissions unit, the permittee shall determine the uncontrolled mass emissions of VOC and HAP (emitted) per volume of each liquid material transloaded in this emissions unit utilizing the formula presented in AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2 dated 6/08 (or subsequent editions), as equation 1:

$$L_L = 12.46 (SPM)/T \quad (= VOC_i \text{ or } VOC_j)$$

Where:

L_L = loading loss, pound of VOC or HAP/1000 gallons of liquid loaded

S = saturation factor = 1.00 for vapor balance loading, 0.60 for uncontrolled submerged loading or 1.45 for uncontrolled splash loading (Table 5.2-1)



P = true vapor pressure of liquid loaded, psia

M = molecular weight of vapors, pounds per pound mole

T = temperature of liquid loaded, 535.09 degrees Rankine (worst case)

- (3) For purposes of compliance with the annual maximum throughput of all liquid materials transloaded in this emissions unit the permittee shall collect and record the following information on a monthly basis the following information:
- a. the company identification for each liquid material transloaded while utilizing a vapor balance system;
 - b. the volume of each liquid material transloaded during the month while utilizing a vapor balance system, Q_i , in thousands of gallons;
 - c. the uncontrolled mass of VOC (emitted) per volume of each liquid material transloaded while utilizing a vapor balance system, VOC_i , in pounds per 1000 gallons;
 - d. the company identification for each liquid material transloaded while utilizing no vapor balance system;
 - e. the volume of each liquid material transloaded during the month while utilizing no vapor balance system, Q_j , in thousands of gallons;
 - f. the uncontrolled mass of VOC (emitted) per volume of each liquid material transloaded while utilizing no vapor balance system, VOC_j , in pounds per 1000 gallons;
 - g. the total VOC emissions from all liquid materials transloaded, in tons; $[0.05 \sum_{i=1}^n (Q_i)(VOC_i) + \sum_{j=1}^n (Q_j)(VOC_j)] \div 2000$ pounds/ton, in tons per month;
 - h. the rolling, 12-month summation of VOC emissions, in tons per year.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

- (4) For purposes of compliance with the annual maximum throughput of all liquid materials transloaded in this emissions unit the permittee shall collect and record the following information on a monthly basis the following information:
- a. the company identification for each liquid material transloaded while utilizing a vapor balance system;
 - b. the volume of each liquid material transloaded during the month while utilizing a vapor balance system, Q_i , in thousands of gallons;



- c. the uncontrolled mass of HAPs (emitted) per volume of each liquid material transloaded while utilizing a vapor balance system, HAP_i , in pounds per 1000 gallons;
- d. the company identification for each liquid material transloaded while utilizing no vapor balance system;
- e. the volume of each liquid material transloaded during the month while utilizing no vapor balance system, Q_j , in thousands of gallons;
- f. the uncontrolled mass of HAPs (emitted) per volume of each liquid material transloaded while utilizing no vapor balance system, HAP_j , in pounds per 1000 gallons;
- g. the total HAP emissions from all liquid materials transloaded, in tons; $[0.05 \sum_{i=1}^n(Q_i)(HAP_i) + \sum_{j=1}^n(Q_j)(HAP_j)] \div 2000$ pounds/ton, in tons per month;
- h. the rolling, 12-month summation of HAP emissions, in tons per year.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

any monthly record showing that the annual maximum throughput of all liquid materials transloaded in this emissions unit exceeds the applicable limitation, i.e., $[0.05 \sum_{i=1}^n(Q_i)(VOC_i) + \sum_{j=1}^n(Q_j)(VOC_j)] \div 2000$ pounds/ton > 61.1 tons of VOC or $[0.05 \sum_{i=1}^n(Q_i)(HAP_i) + \sum_{j=1}^n(Q_j)(HAP_j)] \div 2000$ pounds/ton > 4.6 tons of HAP in any rolling, 12-month period.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.



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The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. None.

g) Miscellaneous Requirements

- (1) None.



2. P901, Solid material transfer operations

Operations, Property and/or Equipment Description:

Material handling operations comprised of the transloading of bulk solid materials.

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	<p>Emissions from the fabric filtration system(s) serving the pneumatic conveying system(s) shall not exceed 0.09 grains per dry standard cubic foot of exhaust gas (gr/dscf) as particulate matter less than or equal to 10 microns in diameter (PM10).</p> <p>Emissions from the fabric filtration system(s) serving the belt conveyor system(s) shall not exceed 0.01 gr/dscf as PM10.</p> <p>Emissions of fugitive dust from all processes comprising the belt conveyor system(s) shall not exceed 31.7 tons as PM10 per rolling, 12-month period.</p> <p>See b)(2)a. and b)(2)b.</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	See b)(2)c.
e.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from all stacks serving this emissions unit shall not exceed 8.77 pounds per hour. See b)(2)a.

(2) Additional Terms and Conditions

- a. The permittee has committed to employ the following control measures for this emissions unit for purposes of ensuring compliance with the above-mentioned applicable requirements:
 - i. The pneumatic system(s) shall be adequately enclosed so as to eliminate at all times visible emissions of fugitive dust and all emissions shall be vented to a fabric filtration system(s).
 - ii. The belt conveyor system(s) shall be enclosed in a manner adequate to provide a minimum 90% capture efficiency and all captured emissions shall be vented to a fabric filtration system(s).

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

- b. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while operating appropriate capture and control systems. Therefore, provided adequate capture and control systems are utilized during the operation of these emissions sources, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.



c) Operational Restrictions

- (1) The permittee shall operate the capture and control system(s) whenever this (these) emissions source(s) are in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when a capture and control system was not in service when the associated emissions source was in operation.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



- (2) The permittee shall identify any daily record showing that a capture and control system was not in service when the associated emissions source was in operation in the annual permit evaluation report.
 - (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:
 - a. any daily record showing that a capture and control system was not in service when the associated emissions source was in operation.
 - b. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - c. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - d. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
 - (4) An exceedance of the visible emissions limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the permittee complies with the requirements of OAC rule 3745-15-06 and none of the conditions listed in OAC rule 3745-15-06(C) are applicable to the source.
 - (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

visible emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.



b. Emission Limitation:

0.09 gr/dscf as PM10.

0.01 gr/dscf as PM10.

Applicable Compliance Method:

These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while operating appropriate control systems. If required, the permittee shall demonstrate compliance with these emission limitations in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA. Emission Limitation:

c. Emission Limitation:

Emissions of fugitive dust from all processes comprising the belt conveyor system(s) shall not exceed 31.7 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit while operating appropriate capture systems. If required, the permittee shall develop a site specific emissions factor in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

PE from all stacks serving this emissions unit shall not exceed 8.77 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.