

Facility ID: 0634000085 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: 0634000085 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 feedstock (250 TPH) and product storage piles.	OAC rule 3745-31-05(A)(3) (PTI 06-07659 issued 9/8/05)	No visible particulate emissions (PE) of fugitive dust except for 1 minute during any 60-minute period. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. (See sections A.2.b through A.2.f.) PE shall not exceed 2.43 TPY.
	OAC rule 3745-17-07(B)(1)	See section A.2.g.
	OAC rule 3745-17-08(B)	See section A.2.g.

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(A)(3) are listed below:

All storage piles:

- One - 0.8 acre feed stock pile; and
- Two - 0.4 acre final product piles.

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 maintain sufficient moisture content of the material 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 maintain sufficient moisture content of the material 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.

This facility is located in Harrison County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

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

All Weekly
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

All Weekly
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

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

The information required in section C.6.d shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (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 deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

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

Applicable Compliance Method:

Compliance with the emission limitation for the unpaved roadways and parking areas 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:

PE shall not exceed 2.43 TPY.

Applicable Compliance Method:

Compliance with the TPY emission limitation shall be demonstrated by the following calculations using emission

factors from AP 42, Compilation of Air Pollutant Emission Factors, Chapter 13.2.4, Equation 1 (issued 1/95) and USEPA's Control of Open Fugitive Dust Sources, Eq. 4-9 (9/88).

$$\text{Material transfer: EF} = k * 0.0032 * [(U/5)^{1.3} / (M/2)^{1.4}]$$

where:

EF = emission factor (lb. PE / ton coal transferred);
 k = particle size multiplier (0.74 dimension less);
 U = mean wind speed, miles per hour (10 mph); and
 M = material moisture content (%).

$$\text{Feedstock} = (0.74) (0.0032) [(10/5)^{1.3} / (25/2)^{1.4}] (2 \text{ transfers}) (2,190,000 \text{ TPY}) (0.0005 \text{ ton/lb}) = 0.37 \text{ TPY uncontrolled}$$

$$\text{Product} = (0.74) (0.0032) [(10/5)^{1.3} / (15/2)^{1.4}] (3 \text{ transfers}) (1,270,200 \text{ TPY}) (0.0005 \text{ ton/lb}) = 0.66 \text{ TPY uncontrolled}$$

$$\text{Wind Erosion associated with storage piles: EF} = 1.7 (s/1.5) (f/15) [(365 - p)/235]$$

where:

EF = lb/day/acre;
 s = silt content;
 f = % of time wind speed exceeds 12 mph;
 p = Number of days per year with > 0.1 inch precipitation; and
 A = total surface area of piles (acres).

$$\text{Feedstock} = 1.7 (3/1.5) (30/15) [(365-145)/235] (365 \text{ d/yr}) (0.8 \text{ acre}) (0.0005 \text{ ton/lb}) = 0.93 \text{ TPY unc.}$$

$$\text{Final Product} = 1.7 (15/1.5) (30/15) [(365-145)/235] (365 \text{ d/yr}) (0.8 \text{ acre}) (0.0005 \text{ ton/lb}) = 4.65 \text{ TPY unc.}$$

Material Transfer Control efficiency = 0% since material moisture content is factored in EF.
 Wind Erosion Control efficiency for water = 75%

$$\text{Total controlled emissions} = \text{Material Transfer unc.} (1 - \% \text{ control}) + \text{Wind Erosion unc.} (1 - \% \text{ control}) = (1.03 \text{ TPY}) (1 - 0.0) + (5.58 \text{ TPY}) (1 - 0.75) = 2.43 \text{ tons PE/yr}$$

F. **Miscellaneous Requirements**

1. None