



State of Ohio Environmental Protection Agency

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**RE: PERMIT TO INSTALL DRAFT
HAMILTON COUNTY
Application No: 14-4705**

CERTIFIED MAIL

	TOXIC REVIEW
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	SYNTHETIC MINOR
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X	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED

DATE: June 30, 1999

Cincinnati Bulk Terminals
Larry Camp
895 West Mehring Way
Cincinnati, OH 45203

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$ 2000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
HAMILTON COUNTY DEPT. OF ENV SERVICES
Lloyd Makstell Technical Food Sales
Kentucky Department of Natural Resources & Environmental Protection
Indiana Office of Air Management

Roy Schweitzer Longworth Hall
Ohio-Kentucky-Indiana Regional Council of Governments



DRAFT OF PERMIT TO INSTALL 14-4705

Application Number: 14-4705

APS Premise Number: 1431072121

Permit Fee: **To be entered upon final issuance**

Name of Facility: Cincinnati Bulk Terminals

Person to Contact: Larry Camp

Address: 895 West Mehring Way
Cincinnati, OH 45203

Location of proposed air contaminant source(s) [emissions unit(s)]:

**895 West Mehring Way
Cincinnati, OHIO**

Description of proposed emissions unit(s):

**BARGE LOADING OF VARIOUS MATERIALS W/WATER SUPPRESSION AND COVERED
CONVEYORS.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	3.6
PM ₁₀	1.3

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Barge Loading of Various Materials (Middle Dock)	OAC rule 3745-31-05	21.6 lbs/hr PM 7.9 lbs/hr PM ₁₀ 3.6 TPY PM 1.3 TPY PM ₁₀
	OAC rule 3745-17-07(B)	See Term A.2.2.a.
	OAC rule 3745-17-08(B)	See Term B.3, B.4 and B.5.
	40 CFR Part 60 Subpart Y	Less Stringent than OAC rule 3745-17-07(B)
	OAC rule 3745-15-07	See Term F.1.

2. Additional Terms and Conditions

- 2.a Visible particulate emissions from emissions unit F016 shall not exceed twenty percent opacity, as a three-minute average.
- 2.b The hourly emission limitations outlined above are based upon the emissions unit’s potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of wet suppression, covered conveyors, a telescoping spout and throughput limitations.

B. Operational Restrictions

1. Emissions unit F016 shall not be operated in excess of the maximum rated capacity of 600 tons per hour.
2. The maximum annual production rate for this emissions unit shall not exceed 200,000 tons per year, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Production</u>
1-1	80,000 TPY
1-2	80,000 TPY
1-3	80,000 TPY
1-4	80,000 TPY
1-5	80,000 TPY
1-6	80,000 TPY
1-7	100,000 TPY
1-8	120,000 TPY
1-9	140,000 TPY
1-10	160,000 TPY
1-11	180,000 TPY
1-12	200,000 TPY

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

3. Wet suppressant shall be applied as needed to eliminate visible emissions during the barge loading process. Spray bars shall be installed, maintained, and operated at the points indicated on the attached diagram.
4. All conveyors in emissions unit F016 shall be covered.
5. All drop heights shall be minimized.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following records:
 - a. Hourly records which verify that emissions unit F016 was checked for visible emissions.
 - b. Daily records which document the times that wet suppressant was applied at each of the transfer points in emissions unit F016.
 - c. Daily records which document the amount in tons of each material loaded in emissions unit F016.
 - d. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative amount of material loaded (production rate) for each calendar month.
 - e. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the rolling, 12-month summation of the amount of material loaded in emissions unit F016.

D. Reporting Requirements

1. At least 14 days prior to loading any material other than coal, the permittee shall provide written notification to the Ohio EPA field office. Such notification shall include information, in an acceptable form, sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and control requirements outlined in this permit.
2. The permittee shall immediately notify the Department of Environmental Services if the control requirements for emissions unit F016 are not met. A report explaining the cause of the violation shall be submitted within thirty (30) days of the occurrence.
3. The permittee shall submit deviation reports that identify all exceedances of the rolling, 12-month summation production rate limitation and, for the first twelve calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels. The reports shall include the updated rolling, 12-month production rate for each month.

E. Testing Requirements

1. Compliance with the PM and PM₁₀ emission limitations in Section A.1. of these terms and conditions shall be demonstrated by the required records and reports.
2. Compliance with the visible particulate emission limitation in Term A.2.2.a. of these terms and conditions shall be demonstrated by OAC rule 3745-17-03(B)(3).
3. Compliance with the production limitations in Term B.2. of these terms and conditions shall be demonstrated by the required records in Term C.1.

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days of achieving maximum production but no later than 180 days after initial startup.
 - b. The emission testing shall be conducted to demonstrate compliance with the opacity limitation.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable opacity limitation: Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

F. Miscellaneous Requirements

1. If probable cause exists indicating that this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.