



Environmental  
Protection Agency

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

1/4/2011

Drexel Short  
Gatling Ohio LLC  
PO Box 960  
New Haven, WV 25265

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0653000073  
Permit Number: P0107086  
Permit Type: OAC Chapter 3745-31 Modification  
County: Meigs

**Certified Mail**

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-SEDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Gatling Ohio LLC**

Facility ID:	0653000073
Permit Number:	P0107086
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	1/4/2011
Effective:	1/4/2011
Expiration:	8/28/2018





Division of Air Pollution Control
Permit-to-Install and Operate
for
Gatling Ohio LLC

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## Authorization

Facility ID: 0653000073  
Application Number(s): A0040569  
Permit Number: P0107086  
Permit Description: This permit action will update the equipment that was actually installed as part of the coal processing plant, including allowing for the installation of a lime bin to treat the filter cake from the plant.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$200.00  
Issue Date: 1/4/2011  
Effective Date: 1/4/2011  
Expiration Date: 8/28/2018  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Gatling Ohio LLC  
Yellow Bush Rd.  
Racine, OH 45771

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

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

  
Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0107086

Permit Description: This permit action will update the equipment that was actually installed as part of the coal processing plant, including allowing for the installation of a lime bin to treat the filter cake from the plant.

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

<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Screen, Crusher & Conveyor
Superseded Permit Number:	06-08389
General Permit Category and Type:	Not Applicable

## **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 Ohio EPA DAPC, Southeast District Office 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 submitting<sup>1</sup> 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.

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<sup>1</sup> Permittees 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.

## **B. Facility-Wide Terms and Conditions**

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.
2. The following emissions unit contained in this permit is subject to 40 CFR Part63, Subpart Y: F003. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

## **C. Emissions Unit Terms and Conditions**



1. F003, Screen, Crusher & Conveyor

Operations, Property and/or Equipment Description:

Coal crushing(1-1,200 TPH), screening (1-1,200 TPH), cleaning and material handling (including 11 conveyors, lime bin loading and barge loading) (Construction commenced March 23, 2009.) Supersedes PTIO 06-08389, issued on August 28, 2008.

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.	OAC rule 3745-31-05(A)(3)	Total fugitive particulate emissions (PE) shall not exceed 21.57 tons/yr.  No visible fugitive PE except for one minute during any 60-minute period.  Best available control measures to minimize or eliminate visible PE of fugitive dusts.
b.	40 CFR Part 60, Subpart Y (In accordance with 40 CFR 30.250, this emissions unit contains affected facilities in a coal preparation plant which processes more than 200 tons of coal per day.)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)(5)	See b)(2)e. below.
d.	OAC rule 3745-17-08(B)	See b)(2)f below.

## (2) Additional Terms and Conditions

- a. The coal processing plant operations that are covered by this permit and subject to the requirements of OAC rules 3745-31-05 are listed below:

Material Handling/Transfer Points

TP1 – Belt conveyor from Mine shaft to Conveyor (BC-1) (1,200TPH)  
TP4 - Conveyor (BC-2) to Screener (SC-1) (1,200TPH)  
TP5 - Screener (SC-1) to Crusher (CR-1) (1,200TPH)  
TP6 - Crusher (CR-1) to conveyor (BC-5)(700 TPH)  
TP7- Screener (SC-1) to conveyor (Wet Wash)(1,200 TPH)  
TP8- Wet Wash Plant to (BC-9)(700 TPH)  
TP9 - Wet Wash Plant to conveyor (BC-5)(700 TPH)  
TP11 - Conveyor (BC-4) to conveyor (BC-7)(700 TPH)  
TP12 - Conveyor (BC-5) to conveyor (BC-4)(700 TPH)  
TP16 – Conveyor (BC-7) to embankment (700 TPH)  
TP17 - Conveyor (BC-8) to barge(700 TPH)  
TP18 - Conveyor (BC-9) to conveyor (BC-6)(700TPH)  
TP19 - Conveyor (BC-10) to conveyor (BC-11)(700 TPH)  
TP20 - Lime Binto conveyor (BC-11)(1TPH-based on lime load-out)  
TP21 - Conveyor (BC-11) to conveyor (BC-7) (700 TPH)

Equipment

Double Deck Screener (SC-1)(1,200TPH)  
Double Roll Crusher (CR-1)(1,200TPH)  
Lime Bin Hopper(2) - 60" conveyor belts (BC-1 and BC-2) (1,200 TPH)  
(7) - 48" conveyor belts (BC- 4, 5, 6, 7, 10 and 11) (1,300 TPH)  
(4) - 48" conveyor belts (BC-8 and 9) (1,625 TPH)

- b. The permittee shall employ best available control measures for the coal processing plant operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee shall perform the following control measures to ensure compliance: maintain full and partial enclosures on applicable transfer points and on the crusher, utilize water sprays on the screener, and employ a telescopic chute for barge loading. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. For each coal processing plant operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the

coal processing plant operations until further observation confirms that use of the control measures is unnecessary.

- d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- e. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
- f. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform inspections for coal processing plant operations in accordance with the following minimum frequencies:

<u>coal processing plant operations</u>	<u>minimum inspection frequency</u>
All	Daily

- (2) The above-mentioned inspections shall be performed during representative, normal operating conditions.

- (3) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
- c. the dates the control measure(s) was (were) implemented; and
- d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in d)(3)d. shall be kept separately for the coal processing plant operations identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.



- (4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart Y, including the following sections:

60.258(a)	Logbook requirements
60.258(a)(1)	Manufacturer's recommended maintenance procedures
60.258(a)(2)	Visual observation record requirements
60.258(a)(3)	Monthly coal process rate
60.258(a)(4)	Water and chemical stabilizing agent usage
60.258(a)(5)	Monthly dust suppressant system certification
60.258(a)(6)	Monthly fugitive coal dust emissions control plan certification

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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 comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart Y, including the following sections:

60.258(b)(3)	Semiannual report of exceedances of opacity standard
60.258(c)	Initial test results submission
60.258(d)	Test data submittal

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1). of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission limitation:

Total fugitive particulate emissions (PE) shall not exceed 21.57tons/yr.

Applicable Compliance Method:**Transfer Points:**

Compliance shall be determined based on the emission factor calculation for drop operations associated with storage piles in AP-42 section 13.2.4 (01/06).

For the following transfer points initial compliance has been determined using inputs representing current conditions as follows for transfer point prior to the wet wash plant:

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

Where:

EF = emission factor expressed in pounds per ton (lbs/ton)

k = particle size multiplier for TSP (dimensionless) = 0.74

U = mean wind speed expressed in miles per hour (MPH) = 7

M = material moisture content (%) = 4

Therefore, EF = 0.0014 lbs/ton

[(transfer points) (maximum annual throughput) (0.0014 Lb PE/ton)]/ 2000lb/ton = uncontrolled PE

TP1, TP4, TP5, and TP7:

[(4 transfer points)(10,512,000 tons/year) (0.0014 lb PE/ton)]/ 2000lb/ton  
=29.43 TPY of uncontrolled PE

Assume 80% control for full enclosure (WVDEP Guidance Document-G10-C)  
(29.43 TPY) (0.20) = 5.89 TPY of controlled PE

TP6:

[(1 transfer points)(6,132,000 tons/year) (0.0014 lb PE/ton)]/ 2000lb/ton  
=4.29TPY of uncontrolled PE

Assume 80% control for full enclosure (WVDEP Guidance Document-G10-C)  
(4.29 TPY) (0.20) = 0.86 TPY of controlled PE

For the following transfer points initial compliance has been determined using inputs representing current conditions as follows for transfer points after the wet wash plant:

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

Where:

EF = emission factor expressed in pounds per ton (lbs/ton)

k = particle size multiplier for TSP (dimensionless) = 0.74

U = mean wind speed expressed in miles per hour (MPH) = 7

M= material moisture content (%) = 7.75  
Therefore, EF = 0.0006 lbs/ton

[(transfer points) (maximum annual throughput) (0.0006 Lb PE/ton)]/ 2000lb/ton = uncontrolled PE

TP8 and TP18:

(2 transfer point)(6,132,000 tons/year) (0.0006 lb PE/ton)]/ 2000lb/ton  
=3.68 TPY of uncontrolled PE

Assume 80% control for full enclosure (WVDEP Guidance Document-G10-C)  
(3.68 TPY) (0.20) = 0.74 TPY of controlled PE

TP17:

[(1 transfer points)(6,132,000 tons/year) (0.0006 lb PE/ton)]/ 2000lb/ton  
= 1.84TPY of uncontrolled PE

Assume 50% control for partial enclosure (WVDEP Guidance Document-G10-C)  
(1.84 TPY) (0.50) =0.92 TPY of controlled PE

For the following transfer points initial compliance has been determined using inputs representing current conditions as follows for transfer points after the wet wash plant:

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

Where:

EF = emission factor expressed in pounds per ton (lbs/ton)  
k = particle size multiplier for TSP (dimensionless) = 0.74  
U = mean wind speed expressed in miles per hour (MPH) = 7  
M= material moisture content (%) = 16  
Therefore, EF = lbs/ton

TP 9 AND TP 11:

[(2 transfer points)(6,132,000 tons/year) (0.0002 lb PE/ton)]/ 2000lb/ton  
=1.23 TPY of uncontrolled PE

Assume 80% control for full enclosure (WVDEP Guidance Document-G10-C)  
(1.23 TPY) (0.20) = 0.25 TPY of controlled PE

TP 12, TP 19 AND TP 21:

[(3 transfer points)(6,132,000tons/year) (0.0002 lb PE/ton)]/ 2000lb/ton  
= 1.84 TPY of uncontrolled PE

Assume 50% control for partial enclosure (WVDEP Guidance Document-G10-C)  
(1.84 TPY) (0.50) =0.92 TPY of controlled PE

TP16:

$[(1 \text{ transfer points})(6,132,000 \text{ tons/year}) (0.0002 \text{ lb PE/ton})] / 2000 \text{ lb/ton}$   
= 0.61 TPY of uncontrolled PE

Assume 70% control for partial enclosure (WVDEP Guidance Document-G10-C)  
(0.61 TPY) (0.30) = 0.18 TPY of controlled PE

TP 20:

$[(1 \text{ transfer point})(8,760 \text{ tons/year})(0.0002 \text{ lb PE/ton})] / 2000 \text{ lb/ton}$   
= 0.0008 TPY of uncontrolled PE

Assume 50% control for partial enclosure ( WVDEP Guidance Document-G10-C)  
(0.0008 TPY)(0.50) = 0.0004 TPY of controlled PE

#### **Pneumatic Loading of Lime Hopper:**

Compliance has been determined using the emission factor for lime loading with enclosed trucks (AP-42, Table 11.17-4):

$[(0.61 \text{ lb PE/ton}) (1 \text{ TPH}) (8760 \text{ hours/year})] / 2000$   
= 2.67 TPY of uncontrolled PE

Assume 80% control for full enclosure (WVDEP Guidance Document –G10-C)  
(2.67 TPY) (0.20) = 0.53 TPY of controlled PE

#### **Crushing and Screening:**

Compliance shall be determined based on the emission factors of 0.02 lb PE/ton for crushing (FIRE factor and RACM Chapter 2.19) and 0.0014 lb PE/ton for vibrating screener (AP-42 section 13.2.4 (01/06)).

$[(1 \text{ crusher})(10,512,000 \text{ tons/year})(0.02 \text{ lb PE/ton}) + (1 \text{ screener}) (10,512,000 \text{ tons/year})(0.0014 \text{ lb PE/ton})] / 2000 \text{ lb/ton} = 187.46 \text{ tons of uncontrolled PE}$

Assume 90 % control for full enclosure and partial enclosure on the crusher (engineering estimate of permittee) and full enclosure and water sprays on the screener (engineering estimate of permittee).

= (112.48 TPY) (0.10) = 11.25 tons of controlled PE

Total controlled PE emissions = 21.57 tons/year

- (2) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
- a. Initial testing was completed at the facility on June 1, 2009 and April 29, 2010. No further testing will be required at this time. Any future testing shall be completed in accordance with the requirements found in 40 CFR 60.255-257.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable visible PE limitation.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):
  - d. Compliance with the visible PE limitation specified by OAC rule 3745-31-05(A)(3) shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").
  - e. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - f. 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 appropriate Ohio EPA District Office or local air agency.
  - g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - h. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
  - i. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.
- g) Miscellaneous Requirements
- (1) None.