

SYNTHETIC MINOR DETERMINATION

Central Fuel Company

- A. Emissions Unit Description: Central Fuel Company operates a coal preparation facility with a thermal dryer near New Philadelphia, Ohio. Emissions unit P001 covers the preparation plant and the dryer, with allowable emission rates of 47.11 pound per hour for particulate matter and 710 pounds per hour for sulfur dioxide. These result in a potential exceedance of Title V thresholds for particulate matter and sulfur dioxide.
- B. Facility and Emissions Unit Emissions: Actual emissions of particulate matter have been tested at 3.6 pounds per hour and sulfur dioxide have been tested at 0.3 pounds per hour at maximum operating rate. The purpose of this FESOP is primarily to enable the facility to maintain their high allowable emission rates without having to worry about Title V applicability.
- C. Emissions Unit Limitations: The facility is restricted by federally enforceable STC's to limit rolling 12-month hours of operation. They are also required to track their hours of operation, keep monthly records and submit excursion reports.
- D. Conclusions: The emission limits contained in these FESOP's are adequate to provide a federally enforceable framework for assuring that applicable Title V thresholds will not be exceeded.

POTENTIAL TO EMIT SUMMARY

Central Fuel Company

Pollutant	Current Allowable #/hour	Current Allowable TPY	Actual Emissions #/hour	Actual Emissions TPY	FESOP Allowable #/hour	FESOP Allowable TPY
PM	47.11	78.5*	3.6	7.3	47.1	96
SO2	710	Not in PTO	0.203	0.4	None	15

* Not enforceable

Actual hourly emissions are from stack tests and actual annual emissions are at 4056 hr/yr.

Fugitive dust from the material handling, and tertiary crushing/screening total 3.6 TPY PM (not PM10). This is included in the facility PTE of $96+3.6=99.6$ because coal preparation plants with thermal dryers are one of the 28 categories of facilities required to do so. This equipment is part of the coal prep plant and therefore defined as "affected facilities" by the NSPS category, even though they are not subject to the subpart due to the age of the plant. The only other EU at the facility is a lime storage tank for wastewater treatment with a PTE of <0.01 TPY.

CALCULATIONS:

The allowable particulate emission limit was established in 1980 according to Table I of OAC 3745-17-11. Even though Table I does not apply to existing sources in Tuscarawas County, this was agreed upon because the uncontrolled rate could not be determined. The limit has been retained over the years, even after an uncontrolled rate was estimated, because the Figure II allowable is 75 #/hr and CFC did not want any question of being considered to have modified the source upon receipt of a higher allowable emission limit, even though the plant throughput (tested - not rated or max) has been increased over the years from 65.4 TPY to 112.5 TPY. The calculation is $55(65.4)^{0.11} - 40 = 47.11$ #/hr.

The FESOP annual allowable particulate limit is based on $(4056 \text{ hr/yr})(47.1 \text{ #/hr}) = 96$ TPY.

The allowable SO₂ hourly limit is from 18-06: $30(112.5)^{0.67} = 710$ #/hr

The FESOP allowable SO₂ annual limit is an arbitrary selection chosen by the facility as one which they feel they can meet and never be questioned concerning compliance.