



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
LORAIN COUNTY
Application No: 02-20126
Fac ID: 0247080229**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 11/18/2004

Republic Engineered Products
Jay Lawniczak
1807 East 28th St
Lorain, OH 44055

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 11/18/2004
Effective Date: 11/18/2004**

FINAL PERMIT TO INSTALL 02-20126

Application Number: 02-20126
Facility ID: 0247080229
Permit Fee: **\$1250**
Name of Facility: Republic Engineered Products
Person to Contact: Jay Lawniczak
Address: 1807 East 28th St
Lorain, OH 44055

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1807 East 28th St
Lorain, Ohio**

Description of proposed emissions unit(s):
185 HP diesel driven coke rail car unloader and stacker.

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. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or

condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

B. State Only Enforceable 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

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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>
NOx (combustion)	25.1
CO (combustion)	5.4
SO2 (combustion)	1.7
OC (combustion)	2.0
PE (combustion)	1.8
PE (Fugitive)	23.1
Total PE	24.9
Total PM10	10.0

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
F026 - Rail Car Coke Unloader	OAC rule 3745-31-05(A)(3)	Emissions from the diesel engine on railcar unloader shall not exceed: Nitrogen Oxide emissions: 5.74 pounds per hour and 25.1 tons per year. Carbon Monoxide emissions: 1.24 pound per hour and 5.4 tons per year. Sulfur Dioxide emissions: 0.38 pound per hour and 1.7 tons per year. Organic Compound emissions: 0.46 pound per hour and 2.0 tons per year. Particulate emissions shall not exceed 1.8 tons per year.(PE = PM10) The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(5)(a) and 3745-17-07(A)(1).
	OAC rule 3745-17-11 (B)(5)(a)	Particulate matter emissions: 0.310 pound per million Btu of actual heat input.
	OAC rule 3745-18-06 (F)	Exempt in accordance with OAC 3745-18-06 (B).
	OAC rule 3745-17-07 (A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.

OAC rule 3745-31-05(A)(3)	<p>Fugitive particulate emissions from the railcar unloader, conveyors and stacker shall not exceed: 23.1 tpy (PM10 = 8.2 tpy).</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.d)</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1) and 3745-17-08(B).</p>
OAC rule 3745-17-07 (B)(1)	<p>Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a three-minute average except as provided by rule.</p>
OAC rule 3745-17-08(B)	<p>The emission limitation specified by this rule is less stringent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

2.a The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

the rail car coke unloader;
conveyors; and
stacker

2.b The permittee shall employ best available control measures for the above-identified material handling operation(s) 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 perform the following control measure(s) to ensure compliance:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
rail car coke unloader	water
conveyors	water
stacker	water

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

2.c For each material handling operation that is not adequately enclosed, the above-identified control measure(s) 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 measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

2.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 rules 3745-17-08 and 3745-31-05.

II. Operational Restrictions

- 1. The permittee shall burn only number two fuel oil in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

- 1. For each day during which the permittee burns a fuel other than number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- 2. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
rail car coke unloader	weekly, when operating
conveyers	weekly, when operating
stacker	weekly, when operating

- 3. The above-mentioned inspections shall be performed during representative, normal operating conditions.
- 4. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- 5. 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 4.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 2. 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; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
- 3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

Compliance with the emission limitations in the Air Emissions Summary and in the terms and conditions for the emissions unit F026 shall be determined in accordance with the following methods:

- 1. Emission Limitation

5.74 pounds of nitrogen oxide per hour
1.24 pound of carbon monoxide per hour
0.38 pound of sulfur dioxide per hour
0.46 pound of organic compounds per hour

Applicable Compliance Method

Compliance shall be demonstrated by applying the emission factors from AP-42, Section 3.3, for "Gasoline and Diesel Industrial Engines", found in Table 3.3-1 as follows:

$$E = EF \times 185 \text{ hp} \quad \text{where}$$

E = emission rate (pounds per hour)
EF = emission factors from AP-42, Fifth edition, Section 3.3 for "Gasoline and Diesel Industrial Engines", 10/96, Table 3.3-1:
for NO_x: 0.031 lbs/hp-hr
for CO : 0.00668 lbs/hp-hr
for SO₂ : 0.00205 lbs/hp-hr
for OC : 0.00247 lbs/hp-hr

185 = power output (hp)

2. Emission Limitation

0.310 pound of particulate matter per million Btu of actual heat input.

Applicable Compliance Method

The particulate emission limit for this emissions unit has been established using the emission factor of 0.0022 pounds/hp-hr or 0.310 pounds/MMBtu, as outlined in AP-42, Section 3.3 for "Gasoline and Diesel Industrial Engines", Table 3.3-1; and this limit is also set by rule.

If required by the Ohio EPA, compliance with the allowable particulate emission limit shall be determined in accordance with the following method(s): Methods 1-4, and Method 5 of 40 CFR Part 60, Appendix A.

3. Emission Limitation

25.1 tons of Nitrogen Oxide per year
5.4 tons of Carbon Monoxide per year
1.7 tons of Sulfur Dioxide per year
1.8 tons of Particulate Matter per year
2.0 tons of Organic Compound per year

Applicable Compliance Method

Compliance with the annual emission limits, for all but particulates, are based on multiplying the hourly emission limits by the maximum allowable operating hours per year (8760 hours per year), and then dividing by 2000 pounds per ton. Compliance with the annual particulate emission limit shall be determined by multiplying the emission factor from AP-42, Section 3.3, for "Gasoline and Diesel Industrial Engines", Table 3.3-1 (0.0022 lb/hp-hr) by the horsepower rating of the diesel engine (185 hp-hr), then multiplying this product by the maximum allowable operating hours per year (8760 hours per year), and then dividing by 2000 pounds per ton.

4. Emission Limitation

Fugitive particulate emissions from the railcar unloader, conveyors and stacker shall not exceed: 23.1 tpy (PM₁₀ = 8.2 tpy).

Applicable Compliance Method

Compliance shall be demonstrated by applying the emission factor for uncontrolled PE from the coke conveying and transfer operations, which is 0.0765 pounds of uncontrolled PE per ton material processed, as noted in Table 2.1.3-2 of RACM and the following equations:

$$PE \text{ (total)} = PE(1) + PE(2a)$$

$$PE \text{ (PM10)} = PE(1)(0.35) + PE(2b)$$

$$PE(1) = (PC)(EFct)(Nt) / 2000 \quad \text{where}$$

PE(1) = Particulate emission rate (tons per year)

PC = maximum coke throughput rate, in tons/yr = 300,000 tpy

EF = emission factor for uncontrolled PE from the coke conveying and transfer operations, as noted in Table 2.1.3-2 of RACM: 0.0765 pounds of uncontrolled PE per ton material processed

Nt = number of transfer points = 2

$$PM10 \text{ (tpy)} = PE(1)(0.35)$$

$$E = k(0.0032)[(U/5)^{1.3} / (M/2)^{1.4}] \quad (\text{AP-42, section 13.2.4, Eq(1)}) \quad (\text{January, '95 version})(\text{load-in/load-out of storage piles})$$

where: E = emission factor (lb/ton)

k = 0.74 (particle size multiplier for particulate < 30µm, dimensionless)

k = 0.35 (particle size multiplier for particulate < 10µm, dimensionless)

U = 10.8 mph (mean wind speed)

M = material moisture content (%), 7.8

$$PE(2a) = 0.14 \text{ tpy} \quad PE \text{ (TSP)} = 0.74(0.0032)[(10.8/5)^{1.3} / (7.8/2)^{1.4}]300,000/2000$$

$$PE(2b) = 0.068 \text{ tpy} \quad PE \text{ (PM10)} = 0.35(0.0032)[(10.8/5)^{1.3} / (7.8/2)^{1.4}]300,000/2000$$

5. Emission Limitation

Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance with the visible particulate emissions from the stack shall be determined in accordance with OAC rule 3745-17-03(B)(3), using the methods and procedures specified in USEPA Reference Method 9, found in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

6. Emission Limitation

Visible particulate emissions from fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method

Compliance with the visible emission limitation for the material handling operation(s) identified above 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"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

1. Notice to Relocate a Portable or Mobile Emissions Unit

Pursuant to OAC rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:

- a. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;
- b. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);
- c. the applicant has provided proper notice of intent to relocate the portable emissions unit to NEDO and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and
- d. in NEDO's and the appropriate Ohio EPA District Office's or local air agency's judgement, the proposed site is acceptable under OAC rule 3745-15-07.

2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:

- a. the permittee of the portable emissions unit possesses an effective Ohio EPA PTI, PTO or registration status;
- b. the portable emissions unit is equipped with best available technology;
- c. the portable emission unit owner has identified the proposed site to Ohio EPA;

- d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - e. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
 - f. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to this proposed site; and
 - g. the portable emissions unit owner has provided Ohio EPA with fifteen days written notice of the relocation.
3. Any site approvals issued by Ohio EPA, pursuant to VI..2. above, shall be valid for no longer than three years and are subject to renewal.

In order for NEDO and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with NEDO and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Upon receipt of the notice, NEDO and/or the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

B. State Only Enforceable Section

I. 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>
F026 - Rail Car Coke Unloader	OAC rule 3745-31-05	LIMIT(s)

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None