

AIR QUALITY DIVISION
CHAPTER 6, SECTION 3
OPERATING PERMIT

WYOMING DEPARTMENT OF
ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
122 West 25th Street
Cheyenne, Wyoming 82002



PERMIT NO. 3-2-135-2

Issue Date: **June 16, 2014**
Expiration Date: **August 21, 2016**
Effective Date: **June 16, 2014**
Replaces Permit No.: **3-2-135-1**

In accordance with the provisions of W.S. §35-11-203 through W.S. §35-11-212 and Chapter 6, Section 3 of the Wyoming Air Quality Standards and Regulations,

P4 Production, LLC
Rock Springs Coal Calcining Plant
Section 14, Township 18 North, Range 105 West
Sweetwater County, Wyoming

is authorized to operate a stationary source of air contaminants consisting of emission units described in this permit. The units described are subject to the terms and conditions specified in this permit. All terms and conditions of the permit are enforceable by the State of Wyoming. All terms and conditions of the permit, except those designated as not federally enforceable, are enforceable by EPA and citizens under the Act. A copy of this permit shall be kept on-site at the above named facility.

Steven A. Dietrich
Steven A. Dietrich, Administrator
Air Quality Division

6-16-14
Date

Todd Parfitt
Todd Parfitt, Director
Department of Environmental Quality

6/18/14
Date

WAQSR CHAPTER 6, SECTION 3 OPERATING PERMIT

WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

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GENERAL INFORMATION

Company Name: **P4 Production, LLC**

Mailing Address: **P.O. Box 1356**

City: **Rock Springs**

State: **WY**

Zip: **82902**

Plant Name: **Rock Springs Coal Calcining Plant**

Plant Location: **Section 14, Township 18 North, Range 105 West, Sweetwater County, WY
(2.5 miles southwest of Rock Springs at Quealy)**

Latitude / Longitude (WGS84): **41.5391/-109.2207**

Plant Mailing Address: **P.O. Box 1356**

City: **Rock Springs**

State: **WY**

Zip: **82902**

Name of Owner: **P4 Production, LLC**

Phone: **(307) 382-2911**

Plant Manager/Contact: **Aimee Anani**

Phone: **(307) 382-2911**

DEQ Air Quality Contact: **District Five Engineer
Air Quality Division
510 Meadowview Drive
Lander, Wyoming 82520**

Phone: **(307) 332-6755**

SIC Code: **3312 – Production of coke in a rotary hearth calciner (non-chemical recovery)**

Description of Process: **This plant produces coarse coke (-1" x +8 mesh) as the primary product with fine coke as a by-product. The process involves feeding bituminous coal into a rotary hearth calciner (coker) to form coke for use at off-site facilities. The calciner is designed to process up to 27.5 tons per hour of feed material and produce coke at a relative yield of about 50-60% of the feed rate.**

Trucks currently deliver coal year round from underground mine in Colorado to the facility over public roadways. The dry coal is received and stored either in a covered silo or an outdoor stockpile. The storage capacity of the silo is 3,000 tons and the outdoor stockpile is maintained at approximately 10,000 tons. To handle the coke overflow at the Coke Loadout Area a coke surge pile has been established with the annual throughput at 3,000 tons and maximum size at 500 tons of coke.

SOURCE EMISSION POINTS

This table may not include any or all insignificant activities at this facility.
 (modified September 24, 2012) (modified June 16, 2014)

SOURCE ID#	SOURCE DESCRIPTION	SIZE	CH. 6, SEC. 2 PERMITS
Unit 1	Rotary Hearth Calciner and Discharge Table (main stack)*	220,000 TPY of feed	MD-208
Unit 1PFB	Propane Fired Burner (located in afterburner of main stack)	55 MMBtu/hr	MD-13965
Unit 2	Fines Baghouse	11,300 ACFM	AP-7566
Unit 4	Fugitive Emissions	N/A	7/19/1991 Division Letter
Unit 5	Coke Loadout Baghouse	30,000 SCFM	AP-3023
Unit 6	Caterpillar D125-6 Emergency Diesel Generator, EPA Tier 3 certified	217 hp	wv-12445
N/A	Coke Product Surge Pile	500 tons	AP-6579

* The main stack **emissions** are controlled by cyclones, a baghouse, and an afterburner.

TOTAL FACILITY ESTIMATED EMISSIONS

For informational purposes only. These emissions are not to be assumed as permit limits.
 (modified September 24, 2012) (modified June 16, 2014)

POLLUTANT	EMISSIONS (TPY)
CRITERIA POLLUTANT EMISSIONS	
Particulate Matter	126
PM ₁₀ Particulate Matter	119
Sulfur Dioxide (SO ₂)	783
Nitrogen Oxides (NO _x)	438
Carbon Monoxide (CO)	14
Volatile Organic Compounds (VOCs)	3
HAZARDOUS AIR POLLUTANT (HAP) EMISSIONS	3

Emission estimates are from **WAQSR Ch 6 Sec 2 Permit MD-13965**.

FACILITY-SPECIFIC PERMIT CONDITIONS

Facility-Wide Permit Conditions

- (F1) PERMIT SHIELD [WAQSR Ch 6, Sec 3(k)]
Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance.
- (F2) FUGITIVE EMISSIONS CONTROL [W.S. 35-11-110; July 19, 1991 Division Letter]
The permittee shall take control measures to minimize fugitive dust emissions from the coal stacker, facility roads and wind erosion of plant grounds.
- (F3) SULFUR DIOXIDE EMISSIONS INVENTORY [WAQSR Ch 14, Sec 3]
The permittee shall comply with the requirements of WAQSR Ch 14, Sec 3, including estimating SO₂ emissions in accordance with Ch 14 Sec 3(b), and adjusting estimates in accordance with Ch 14 Sec 3(c), if necessary.

Source-Specific Permit Conditions

- (F4) VISIBLE EMISSIONS [WAQSR Ch 3, Sec 2; Ch 6, Sec 2 Waivers AP-3023, AP-7566, 40 CFR Part 60 Subpart Y] (modified September 24, 2012) (modified June 16, 2014)
- (a) The opacity from the main stack (unit 1), the fines baghouse (unit 2), and the coke loadout baghouse (unit 5) shall be limited to a maximum of 20 percent, as determined by Method 9 of 40 CFR part 60, Appendix A.
 - (b) Visible emissions of any contaminant discharged into the atmosphere from any other single emission source shall not exhibit greater than 20 percent opacity except for one period or periods aggregating not more than six minutes in any one hour of not more than 40 percent opacity.
 - (c) **Visible emissions from the diesel fired engine, Caterpillar D125-6 (unit 6), shall not exceed 30 percent opacity except for periods not exceeding ten consecutive seconds.**
- (F5) PARTICULATE EMISSIONS [WAQSR Ch 6, Sec 2 Permits MD-208, **MD-13965**; Waivers AP-3023, AP-6579, AP-7566] (modified June 16, 2014)
- (a) The particulate emissions from the main stack (unit 1) shall not exceed 22.0 lb/hr. **All limits for the main stack baghouse shall remain in effect with operation of the propane fired burner (unit 1PFB) during cold start-up.**
 - (b) The particulate emissions from the fines baghouse (unit 2) shall not exceed 1.0 lb/hr.
 - (c) The particulate emissions from the coke loadout baghouse (unit 5) shall be no greater than 0.01 gr/dscf and 2.6 lb/hr.
 - (d) The annual throughput for the coke product surge pile shall be limited to 3,000 tons of coke.
- (F6) **OPERATION REQUIREMENTS** [WAQSR Ch 3, Sec 2; Ch 6, Sec 2 Waiver wv-12445] (modified September 24, 2012) (modified June 16, 2014)
- (a) The diesel emergency generator, Caterpillar D125-6 (unit 6), shall be EPA Tier 3 certified.
 - (b) Operation of the Caterpillar D125-6 generator shall not exceed 570 hours per calendar year. The permittee shall install and maintain a non-resettable hour meter on the engine to demonstrate compliance with the hours limit in this condition.
 - (c) **The 55 MMBtu/hr propane fired low-NO_x burner (unit 1PFB) shall only be used for preheating the air in the afterburner area during cold start-up operations. Cold start-up operations end when the afterburner reaches the standard operating temperature range between 1,700 °F and 2,000 °F and can operate self-sustained without elevated opacity.**
 - (d) **The 55 MMBtu/hr propane fired burner (unit 1PFB) shall be limited to 300 hours of operation per calendar year.**
- (F7) TEMPORARY ENGINE REPLACEMENT [WAQSR Ch 6, Sec 3(h)(i)(I)] (modified September 24, 2012)
- (a) Should an engine break down or require an overhaul, the permittee may bring on site and operate a temporary replacement engine until repairs are made. Permanent replacement of an engine must be evaluated by the Division under Ch 6, Sec 2 of WAQSR to determine

- appropriate permitting action and evaluate the need for additional requirements resulting from the permanent replacement.
- (b) The temporary replacement unit shall be identical or similar to the unit replaced with emission levels at or below those of the unit replaced.
 - (c) The permittee shall notify the Division in writing of such replacement within five working days, provide the date of startup of the replacement, and provide a statement regarding the applicability of any New Source Performance Standards (NSPS) in 40 CFR Part 60; any National Emission Standards for Hazardous Air Pollutants (NESHAPs) in 40 CFR Part 63; and Compliance Assurance Monitoring (CAM) in WAQSR Ch 7, Sec 3.

Testing Requirements

- (F8) PARTICULATE EMISSIONS TESTING [W.S. 35-11-110; WAQSR Ch 6, Sec 2 Permit MD-208]
 - (a) The permittee shall measure particulate emissions from the main stack (unit 1) at least once every five years for comparison with the emission limits specified in condition F5(a) of this permit.
 - (i) Methods 1-5, front half only, shall be used to measure particulate emissions.
 - (ii) During the emissions testing, the permittee shall concurrently monitor and record the selected indicator(s) established in the approved compliance assurance monitoring (CAM) plan, attached as Appendix A of this permit
 - (b) Unless otherwise specified, testing shall be conducted in accordance with WAQSR Ch 5, Sec 2(h)
- (F9) ADDITIONAL EMISSIONS TESTING [W.S. 35-11-110; WAQSR Ch 6, Sec 2 Permit MD-208]
 - (a) The Division reserves the right to require additional testing as provided under condition G1 of this permit. Should testing be required, test methods found at 40 CFR 60, Appendix A, shall be used as follows:
 - (i) For visible emissions, Method 9 shall be used.
 - (ii) For particulate emissions, Methods 1-4 and 5 shall be used; Methods 1-5, front half only, shall be used for the main stack (unit 1).
 - (iii) For SO₂ emissions, Methods 1-4 and 6 or 6C shall be used.
 - (iv) For NO_x emission sources Methods 1-4 and 7 or 7E shall be used.
 - (v) For CO emissions, Methods 1-4 and 10 shall be used.
 - (vi) For alternative test methods, or methods used for other pollutants, the approval of the Administrator must be obtained prior to using the test method to measure emissions.
 - (b) Unless otherwise specified, testing shall be conducted in accordance with WAQSR Ch 5, Sec 2(h).

Monitoring Requirements

- (F10) FUGITIVE EMISSIONS AND THROUGHPUT MONITORING
[WAQSR Ch 6, Sec 3(h)(i)(C)(I); July 19, 1991 Division Letter]
 - (a) The permittee shall monitor all control measures used to minimize fugitive dust emissions from the coal stacker, facility roads and wind erosion of plant grounds, including, but not limited to, the following:
 - (i) Which areas receive treatment with dust suppressant chemicals, and which areas receive water treatment for fugitive dust control.
 - (ii) A description of the dust suppressant, how it is applied, the quantities applied, and the frequency of application.
 - (iii) The amount of water applied in gallons or water truck hours.
 - (b) The permittee shall monitor the throughput, in tons, of the coke product surge pile.
- (F11) VISIBLE EMISSIONS MONITORING [WAQSR Ch 6, Sec 3(h)(i)(C)(I)] (modified September 24, 2012)
 - (a) The permittee shall conduct, at a minimum, quarterly Method 9 observations to measure visible emissions from the main stack (unit 1).
 - (i) The visual observations shall be performed by a qualified observer certified in accordance with Section 3.1 of Method 9 and shall follow the requirements and procedures of Method 9.
 - (ii) Observation of any visible emissions from the unit shall prompt immediate inspection and, if necessary, corrective action.

- (b) The permittee shall conduct, at a minimum, once daily Method 22-like visual observations of the fines baghouse, and the coke loadout baghouse (units 2 and 5).
 - (i) The visual observations shall be performed by a person who is educated on the general procedures of Method 9, but not necessarily certified to perform Method 9 observations.
 - (ii) Observation of visible emissions from either unit shall prompt immediate inspection and, if necessary, corrective action.
- (c) **The permittee shall conduct observations of visible emissions from the emergency diesel-fired engine, Caterpillar D125-6 (unit 6), during periodic availability assurance tests of this source, at least semi-annually, to assess compliance with the opacity limit under condition F4(c) and to identify maintenance needs. The visual observations shall be conducted by a person who is educated on the general procedures for determining the presence of visible emissions but not necessarily certified to perform Method 9 observations. Observation of emissions in excess of the limit in condition F4(c) shall prompt corrective action.**

(F12) PARTICULATE EMISSIONS MONITORING [WAQSR Ch 6, Sec 3(h)(i)(C)(I); Ch 7, Sec 3(c)(ii)] (modified September 24, 2012)

- (a) For particulate emissions from the baghouse controlled equipment (units 1 and 5), the permittee shall adhere to the compliance assurance monitoring (CAM) plan, attached as Appendix A of this permit, and shall conduct monitoring as follows:
 - (i) For unit 1, the permittee shall monitor the pressure drop across the main stack baghouse, the pressure drop across the high temperature cyclones, and the downcomer (afterburner outlet) temperature, at minimum, once daily.
 - (ii) An excursion is defined as operation outside of the pressure drop and temperature ranges established in the approved CAM plans. Operation outside of the established ranges from any of these units shall prompt immediate inspection and, if necessary, corrective actions.
 - (iii) The permittee shall measure particulate emissions from the main stack (unit 1), as specified in condition F8, to further refine the relationship between emissions and the selected CAM indicators.
 - (iv) The permittee shall conduct the daily observations of the coke loadout baghouse (unit 5) as required by condition F11(b).
 - (v) The permittee shall follow all other applicable requirements under conditions CAM-1 through CAM-4 of this permit.
- (b) Periodic monitoring of particulate emissions of the fines baghouse (unit 2) shall consist of the visual observations required by condition F11(b) of this permit.

(F13) OPERATION HOURS MONITORING [WAQSR Ch 6, Sec 3(h)(i)(C)(I); Ch 6, Sec 2 Permit MD-13965, Waiver wv-12445] (modified September 24, 2012), (modified June 16, 2014)

- (a) The permittee shall monitor the operating hours of the Caterpillar D125-6 diesel fired generator engine (unit 6) on a monthly basis.**
- (b) The permittee shall monitor for and document the dates and duration of time of any cold start-ups and the operating hours of the propane fired burner (unit IPFB).**

Recordkeeping Requirements

(F14) SULFUR DIOXIDE EMISSIONS INVENTORY RECORDS [WAQSR Ch 14, Sec 3(b)] (modified September 24, 2012)

- (a) The permittee shall maintain all records used in the calculation of SO₂ emissions for the inventory required by condition F3, including but not limited to the following:
 - (i) Amount of fuel consumed;
 - (ii) Percent sulfur content of fuel and how the content was determined;
 - (iii) Quantity of product produced;
 - (iv) Emissions monitoring data;
 - (v) Operating data; and
 - (vi) How the emissions are calculated, including monitoring/estimation methodology with a demonstration that the selected methodology is acceptable under Ch 14, Sec 3.
- (b) The permittee shall maintain records of any physical changes to facility operations or equipment, or any other changes (e.g. raw material or feed) that may affect emissions projections of SO₂.

- (c) The permittee shall retain all records and support information for compliance with this condition and with the reporting requirements of condition F19 at the facility, for a period of **at least ten (10) years** from the date of establishment, or if the record was the basis for an adjustment to the milestone, five years after the date of an implementation plan revision, whichever is longer.

(F15) FUGITIVE EMISSIONS AND THROUGHPUT RECORDS

[WAQSR Ch 6, Sec 3(h)(i)(C)(II) AND Ch 6, Sec 2 Waiver AP-6579] **(modified September 24, 2012)**

- (a) For the fugitive emission control required under condition F2, the permittee shall keep records of the following:
 - (i) A list of equipment dedicated, either full or part time, to fugitive dust control (number of water trucks, water capacity, number of graders, etc.).
 - (ii) A quantification of how much dust suppressant (gallons, or tons) is applied, including dates and locations of application.
 - (iii) A quantification of how much watering (gallons, or water truck hours) is completed on a calendar year basis.
 - (iv) The commitments made in the fugitive control reports required in condition F20(a).
- (b) For the coke product surge pile requirement under condition F5(d), the permittee shall keep records of the annual coke throughput.
- (c) The permittee shall retain these records on-site at the facility for a period of at least five years from the date when the record was generated.

(F16) TESTING AND MONITORING RECORDS [WAQSR Ch 6, Sec 3(h)(i)(C)(II); Ch 6, Sec 2 Permit MD-13965, Waiver wv-12445] (modified September 24, 2012) (modified June 16, 2014)

- (a) For any testing or monitoring required under conditions F8 and F9, other than Method 9 or Method 22-like observations, the permittee shall record, as applicable, the following:
 - (i) The date, place, and time of sampling or measurements;
 - (ii) The date(s) the 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 and, for any testing of the main stack (unit 1) the CAM indicators, as they existed at the time of sampling or measurement; and
 - (vii) Any corrective actions taken.
- (b) For any Method 9 observations required by the Division under conditions F9 or F11, the permittee shall keep field records in accordance with Section 2.2 of Method 9.
- (c) The permittee shall record the results of the daily Method 22-like visual observations of the fines baghouse (unit 2).
- (d) The permittee shall retain on-site at the facility, the records of each test, measurement, or observation and support information for a period of at least five years from the date of the test, measurement, or observation.
- (e) **The permittee shall keep records of the operating hours of the diesel fired generator engine (unit 6) monitored under condition F13(a).**
- (f) **The permittee shall keep records of the dates and duration of time of any cold start-ups and the operating hours of the propane fired burner (unit 1PFB).**

(F17) CERTIFICATION RECORDS [WAQSR Ch 6, Sec 3(h)(i)(C)(II); Ch 6, Sec 2 Waiver wv-12445] (modified September 24, 2012)

A record demonstrating that the Caterpillar D125-6 diesel generator engine (unit 6) is EPA Tier 3 certified shall be available upon request and be kept for the life of the engine.

(F18) CAM RECORDS [WAQSR Ch 6, Sec 3(h)(i)(C)(II) & Ch 7, Sec 3(i)(ii)] (modified September 24, 2012)

- (a) For the CAM required under condition F12, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to WAQSR Ch 7, Sec 3(h), any activities undertaken to implement a Quality Improvement Plan (QIP), and other supporting information required to be maintained under WAQSR Ch 7, Sec 3.

- (b) The permittee shall record the daily pressure drop across the main stack baghouse, the pressure drop across high temperature cyclones, the downcomer (afterburner outlet) temperature (unit 1), and the results of the daily visible emissions monitoring of coke loadout baghouse (unit 5).
- (c) The permittee shall retain on-site at the facility the records of each test, measurement, or observation and support information for a period of at least five years from the date of the test, measurement, or observation.

Reporting Requirements

**(F19) SULFUR DIOXIDE EMISSIONS INVENTORY REPORTS [WAQSR Ch 14, Sec 3(b) and (c)]
(modified September 24, 2012) (modified June 16, 2014)**

- (a) The permittee shall report calendar year SO₂ emissions by April 15th of the following year. The inventory shall be submitted in the format specified by the Division.
- (b) Emissions from startup, shutdown, and upset conditions shall be included in the inventory.
- (c) If the permittee uses a different emission monitoring or calculation method than was used to report SO₂ emissions in **2006**, the permittee shall adjust reported SO₂ emissions to be comparable to the emission monitoring or calculation method that was used in **2006**. The calculations that are used to make this adjustment shall be included with the annual emission report.
- (d) The annual reports shall reference this permit condition **F19** and shall be submitted in accordance with condition G4 of this permit.

(F20) FUGITIVE EMISSIONS AND THROUGHPUT REPORTS [WAQSR Ch 6, Sec 3(h)(i)(C)(III); July 19, 1991 Division Letter] (modified September 24, 2012)

- (a) The permittee shall submit a fugitive dust control plan and report by March 1 each year. Specific elements of the report shall include:
 - (i) A list of equipment dedicated, either full or part time, to fugitive dust control (number of water trucks, water capacity, number of graders, etc.).
 - (ii) A quantification of how much dust suppressant (gallons, tons) was applied during the previous calendar year, including dates and locations of application.
 - (iii) A quantification of how much watering (gallons, or water truck hours) was accomplished during the previous calendar year.
 - (iv) A watering plan with a description of what watering technique and frequency will be used to control fugitive dust in the current calendar year.
 - (v) A description of what dust suppressant will be used and how it will be applied (application rate, frequency, dilution rate, special applications procedures, scarification, etc.) in the current year.
 - (vi) A map of all trafficked areas and roads associated with plant grounds, indicating which areas will receive treatments with dust suppressant chemicals in the current calendar year and which areas will be watered.
- (b) The permittee shall report the annual throughput of the coke product surge pile by January 31 each year.
- (c) The annual reports shall reference this permit condition **F20** and shall be submitted in accordance with condition G4 of this permit.

(F21) TEST REPORTS [WAQSR Ch 6, Sec 3(h)(i)(C)(III)] (modified September 24, 2012)

- (a) The permittee shall report the results of the emissions tests required under condition **F8**, and any additional testing required by the Division under condition **F9**, within 45 days of conducting the tests.
- (b) The reports shall include the information specified under condition **F16** of this permit and reference this permit condition **F21**, and shall be submitted to the Division in accordance with condition G4.

**(F22) MONITORING REPORTS [WAQSR Ch 6, Sec 3(h)(i)(C)(III); Ch 6, Sec 2]
(modified September 24, 2012) (modified June 16, 2014)**

- (a) The following shall be reported to the Division by January 31 and July 31 each year:
 - (i) Results of the quarterly Method 9 observations of the main stack (unit 1) required under monitoring condition **F11(a)** of this permit.

- (ii) Summary results of the daily visible emissions monitoring of the fines baghouse and the coke loadout baghouse (units 2 and 5) required under monitoring condition **F11(b)** of this permit, including any corrective actions taken. If no visible emissions were observed, this shall be stated in the report.
- (iii) Summary results of the CAM monitoring required under condition **F12** for the main stack and the coke loadout baghouse (units 1 and 5). The results shall include the following:
 - (A) Summary information on the number, duration, and cause of excursions, as applicable, and the corrective actions taken;
 - (B) Summary information on the number, duration, and cause for monitor downtime incidents; and
 - (C) A description of the action taken to implement a QIP (if required) during the reporting period as specified in Chapter 7, Section 3 (h). Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has reduced the likelihood of similar excursions.
- (b) **The permittee shall report the following to the Division by January 31 each year:**
 - (i) The operating hours for the Caterpillar D125-6 diesel fired generator engine (unit 6) for the previous calendar year.**
 - (ii) The operating hours of the propane fired burner (unit 1PFB) for the previous calendar year.**
- (c) All instances of deviations from the conditions of this permit must be clearly identified in each report.
- (d) The reports shall reference this permit condition **F22** and shall be submitted in accordance with condition **G4** of this permit.

(F23) GREENHOUSE GAS REPORTS [W.S. 35-11-110]

The permittee shall submit to the Division a summary of any report(s) required to be submitted to the EPA under 40 CFR Part 98.

- (a) The report(s) shall be submitted to the Division within 60 days of submission to EPA, in a format as specified by the Division.
- (b) The report(s) shall be submitted in accordance with condition **G4(a)(i)** of this permit, to the attention of the Division's Emission Inventory Program. A copy need not be sent to the DEQ Air Quality contact.

(F24) REPORTING EXCESS EMISSIONS & DEVIATIONS FROM PERMIT REQUIREMENTS [WAQSR Ch 6, Sec 3(h)(i)(C)(III)]

- (a) General reporting requirements are described under the General Conditions of this permit. The Division reserves the right to require reports as provided under condition **G1** of this permit.
- (b) Emissions which exceed the limits specified in this permit and which are not reported under a different condition of this permit shall be reported annually with the emission inventory unless specifically superseded by condition **G17**, condition **G19**, or other condition(s) of this permit. The probable cause of such exceedance, the duration of the exceedance, the magnitude of the exceedance, and any corrective actions or preventative measures taken shall be included in this annual report. For sources and pollutants which are not continuously monitored, if at any time emissions exceed the limits specified in this permit by 100 percent, or if a single episode of emission limit exceedance spans a period of 24 hours or more, such exceedance shall be reported to the Division within one working day of the exceedance. (Excess emissions due to an emergency shall be reported as specified in condition **G17**. Excess emissions due to unavoidable equipment malfunction shall be reported as specified in condition **G19**.)
- (c) Any other deviation from the conditions of this permit shall be reported to the Division in writing within 30 days of the deviation or discovery of the deviation.

**WAQSR CHAPTER 5, SECTION 2 NEW SOURCE PERFORMANCE STANDARDS (NSPS) AND
40 CFR 60 SUBPART III REQUIREMENTS
FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES**
(modified September 24, 2012)

SUBPART III REQUIREMENTS

[40 CFR 60 Subparts A and III; WAQSR Ch 5, Sec 2 and Ch 6, Sec 2 Waiver wv-12445]

The permittee shall meet the requirements of 40 CFR 60 Subparts A and III and WAQSR Ch 5, Sec 2, as they apply to stationary compression ignition (CI) internal combustion engines, including the Caterpillar D125-6 diesel fired generator engine (unit 6). For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. An affected source is defined at §60.4200.

**WAQSR CHAPTER 5, SECTION 2 NEW SOURCE PERFORMANCE STANDARDS (NSPS) AND
40 CFR PART 60 SUBPART Y REQUIREMENTS FOR COAL PREPARATION & PROCESSING PLANTS**
(modified September 24, 2012)

SUBPART Y REQUIREMENTS [40 CFR Part 60 Subparts A and Y; and WAQSR Ch 5, Sec 2]

The permittee shall meet all requirements of 40 CFR Part 60 Subparts A and Y and WAQSR Ch 5, Sec 2 as they apply to the affected facilities as defined under §60.250 in coal preparation plants which process more than 181 Mg (200 tons) of coal per day, including: Thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems, coal transfer and loading systems, and open storage piles. This includes the main stack (unit 1), the fines baghouse (unit 2), the coke loadout baghouse (unit 5), and the coke product surge pile.

The subparts are available at <http://www.gpoaccess.gov/cfr/retrieve.html>, or from the Division upon request.

WAQSR CHAPTER 5, SECTION 3 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS) AND 40 CFR 63 SUBPART ZZZZ REQUIREMENTS FOR STATIONARY RICE (RECIPROCATING INTERNAL COMBUSTION ENGINES)

(modified September 24, 2012)

SUBPART ZZZZ REQUIREMENTS [40 CFR 63 Subparts A and ZZZZ; and WAQSR Ch 5, Sec 3]

The permittee shall meet all applicable requirements of 40 CFR 63 Subparts A and Subpart ZZZZ and WAQSR Ch 5, Sec 3, as they apply to each affected source as indicated in §63.6590(a). An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand. (As required by condition F7(c), if an engine is replaced or reconstructed, subpart applicability will need to be re-evaluated and a statement regarding applicability submitted to the Division.) This facility is currently identified as an area source of HAP emissions. Affected sources at this facility include the Caterpillar D125-6 diesel fired generator engine (unit 6).

The subpart is available at <http://www.gpoaccess.gov/cfr/retrieve.html>, or from the Division upon request.

WAQSR CHAPTER 7, SECTION 3
COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS

WAQSR Ch 7, Sec 3 is available at <http://deq.state.wy.us/aqd/standards.asp>, or from the Division upon request. (modified September 24, 2012)

- (CAM-1) **COMPLIANCE ASSURANCE MONITORING REQUIREMENTS [WAQSR Ch 7, Sec 3(b) and (c)]**
The permittee shall follow the CAM plan attached as Appendix B of this permit and meet all CAM requirements of WAQSR Chapter 7, Section 3 as they apply to the multi-layer controlled main stack (unit 1) and the coke loadout baghouse (unit 5) as identified in conditions F12. Compliance with the source specific monitoring, recordkeeping, and reporting requirements of this permit meets the monitoring, recordkeeping, and reporting requirements of WAQSR Ch 7, Sec 3, except for additional requirements specified under conditions CAM-2 through CAM-4.
- (CAM-2) **OPERATION OF APPROVED MONITORING [WAQSR Ch 7, Sec 3(g)]**
- (a) At all times, the permittee shall maintain the monitoring under this section, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - (b) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct all monitoring in continuous operation (or at all required intervals) at all times that the pollutant specific emissions unit is operating.
 - (c) Upon detecting an excursion, the permittee shall restore operation of the pollutant-specific emission unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices. The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.
 - (d) If the permittee identifies a failure to achieve compliance with an emission limit for which the monitoring did not provide an indication of an excursion while providing valid data, or the results of compliance or performance testing documents a need to modify the existing indicator ranges, the permittee shall promptly notify the Division and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes.
- (CAM-3) **QUALITY IMPROVEMENT PLAN (QIP) REQUIREMENTS [WAQSR Ch 7, Sec 3(h)]**
- (a) If the Division or the EPA Administrator determines, based on available information, that the permittee has used unacceptable procedures in response to an excursion or exceedance, the permittee may be required to develop and implement a Quality Improvement Plan (QIP).
 - (b) If required, the permittee shall maintain a written Quality Improvement Plan (QIP) and have it available for inspection.
 - (c) The plan shall include procedures for conducting one or more of the following:
 - (i) Improved preventative maintenance practices.
 - (ii) Process operation changes.
 - (iii) Appropriate improvements to control methods.
 - (iv) Other steps appropriate to correct control.
 - (v) More frequent or improved monitoring (in conjunction with (i) - (iv) above).
 - (d) If a QIP is required, the permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the Division if the period for completing the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
 - (e) Following implementation of a QIP, upon any subsequent determination under paragraph (a) above, the Division may require the permittee to make reasonable changes to the QIP if the QIP failed to address the cause of control device problems, or failed to provide adequate procedures for correcting control device problems as expeditiously as practicable.
 - (f) Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limit(s) or any existing monitoring, testing, reporting, or recordkeeping requirements that may be applicable to the facility.
- (CAM-4) **SAVINGS PROVISIONS [WAQSR Ch 7, Sec 3(j)]**
Nothing in the CAM regulations shall excuse the permittee from compliance with any existing emission limit or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may be applicable to the facility.

COMPLIANCE CERTIFICATION AND SCHEDULE
(modified September 24, 2012) (modified June 16, 2014)

Compliance Certification [WAQSR Ch 6, Sec 3(h)(iii)(E)]

- (C1) (a) The permittee shall submit by January 31 each year a certification addressing compliance with the requirements of this permit. The certification shall be submitted as a stand-alone document separate from any monitoring reports required under this permit.
- (b) (i) For fugitive emissions, the permittee shall assess compliance with condition F2 of this permit by conducting the monitoring required by condition F10 and reviewing the records required by condition F15.
- (ii) For visible emissions, the permittee shall assess compliance with condition F4 of this permit by conducting the monitoring required by condition F11.
- (iii) For the sulfur dioxide emissions inventory, the permittee shall assess compliance with condition F3 of this permit by reviewing records kept in accordance with condition F14 and verifying reports were submitted in accordance with condition F19.
- (iv) For particulate emissions from the main stack (unit 1), the permittee shall assess compliance with condition F5(a) of this permit by conducting the testing required by condition F8 and the monitoring required by condition F12.
- (v) For particulate emissions from the fines baghouse (unit 2) the permittee shall assess compliance with condition F5(b) of this permit by conducting the monitoring required by condition F12(b).
- (vi) For particulate emissions from the coke loadout baghouse (unit 5), the permittee shall assess compliance with condition F5(c) of this permit by conducting the monitoring required by condition F12(a).
- (vii) For throughput limitations on the coke product surge pile, the permittee shall assess compliance with condition F5(d) by reviewing the records required by condition F15(b).
- (viii) For the operating hours limitation on the diesel emergency generator, Caterpillar D125-6 (unit 6), the permittee shall assess compliance with condition F6(b) of this permit by conducting the monitoring required by condition F13(a).
- (ix) For the propane fired burner operating requirements, the permittee shall assess compliance with condition F6(c) and (d) by conducting the monitoring required by condition F13(b).**
- (x) For greenhouse gas reporting, the permittee shall assess compliance with condition F23 by verifying that reports were submitted in accordance with condition F23(b).**
- (xi) For the Caterpillar D125-6 diesel fired generator engine (unit 6) subject to 40 CFR 60 Subpart IIII, the permittee shall assess compliance with Subpart IIII by conducting any applicable testing and monitoring required by §§60.4209, 60.4211, 60.4212, and 60.4213, and by reviewing the records required by §§60.4211 and 60.4214.**
- (xii) For any unit subject to 40 CFR 60 Subpart Y, the permittee shall assess compliance with Subpart Y by conducting any applicable testing and monitoring required by §§60.255, 60.256, and 60.257, and by reviewing the records required by §60.258.**
- (xiii) The permittee shall assess compliance with Part 63 Subpart ZZZZ by conducting any applicable testing and monitoring required by §§63.6610 through 63.6640 and by reviewing the records required by §§63.6655 and 63.6665.**
- (c) The compliance certification shall include:
- (i) The permit condition or applicable requirement that is the basis of the certification;
- (ii) The current compliance status;
- (iii) Whether compliance was continuous or intermittent; and
- (iv) The methods used for determining compliance.
- (d) For any permit conditions or applicable requirements for which the source is not in compliance, the permittee shall submit with the compliance certification a proposed compliance plan and schedule for Division approval.
- (e) The compliance certification shall be submitted to the Division in accordance with condition G4 of this permit and to the Assistant Regional Administrator, Office of Enforcement, Compliance, and Environmental Justice (8ENF-T), U.S. EPA - Region VIII, 1595 Wynkoop Street, Denver, CO 80202-1129.

- (f) Determinations of compliance or violations of this permit are not restricted to the monitoring requirements listed in paragraph (b) of this condition; other credible evidence may be used.

Compliance Schedule [WAQSR Ch 6, Sec 3(h)(iii)(C) and (D)]

- (C2) The permittee shall continue to comply with the applicable requirements with which the permittee has certified that it is already in compliance.
- (C3) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.

GENERAL PERMIT CONDITIONS

Powers of the Administrator: [W.S. 35-11-110]

- (G1) (a) The Administrator may require the owner or operator of any point source to complete plans and specifications for any application for a permit required by the Wyoming Environmental Quality Act or regulations made pursuant thereto and require the submission of such reports regarding actual or potential violations of the Wyoming Environmental Quality Act or regulations thereunder.
- (b) The Administrator may require the owner or operator of any point source to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions, or provide such other information as may be reasonably required and specified.

Permit Renewal and Expiration: [WAQSR Ch 6, Sec 3(c)(i)(C), (d)(ii), (d)(iv)(B), and (h)(i)(B)][W.S. 35-11-206(f)]

- (G2) This permit is issued for a fixed term of five years. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted at least six months prior to the date of permit expiration. If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit is not a violation of WAQSR Chapter 6, Section 3 until the Division takes final action on the renewal application. This protection shall cease to apply after a completeness determination if the applicant fails to submit by the deadline specified in writing by the Division any additional information identified as being needed to process the application.

Duty to Supplement: [WAQSR Ch 6, Sec 3(c)(iii)]

- (G3) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after this permit is issued.

Submissions: [WAQSR Ch 6, Sec 3(c)(iv)] [W.S. 35-11-206(c)]

- (G4) Any document submitted shall be certified as being true, accurate, and complete by a responsible official.
- (a) Submissions to the Division.
- (i) Any submissions to the Division including reports, certifications, and emission inventories required under this permit shall be submitted as separate, stand-alone documents and shall be sent to:
- Administrator, Air Quality Division
122 West 25th Street
Cheyenne, Wyoming 82002
- (ii) Unless otherwise noted elsewhere in this permit, a copy of each submission to the Administrator under paragraph (a)(i) of this condition shall be sent to the DEQ Air Quality Contact listed on page 3 of this permit.
- (b) Submissions to EPA.
- (i) Each certification required under condition C1 of this permit shall also be sent to:
- Assistant Regional Administrator
Office of Enforcement, Compliance, and Environmental Justice (8ENF-T)
U.S. EPA - Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129
- (ii) All other required submissions to EPA shall be sent to:
- Office of Partnerships and Regulatory Assistance
Air and Radiation Program (8P-AR)
U.S. EPA - Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Changes for Which No Permit Revision Is Required: [WAQSR Ch 6, Sec 3(d)(iii)]

- (G5) The permittee may change operations without a permit revision provided that:
- (a) The change is not a modification under any provision of title I of the Clean Air Act;
 - (b) The change has met the requirements of Chapter 6, Section 2 of the WAQSR and is not a modification under Chapter 5, Section 2 or Chapter 6, Section 4 of the WAQSR and the changes do not exceed the emissions allowed under the permit (whether expressed therein as a rate of emissions or in terms of total emissions); and
 - (c) The permittee provides EPA and the Division with written notification at least 14 days in advance of the proposed change. The permittee, EPA, and the Division shall attach such notice to their copy of the relevant permit. For each such change, the written notification required shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield, if one exists for this permit, shall not apply to any such change made.

Transfer of Ownership or Operation: [WAQSR Ch 6, Sec 3(d)(v)(A)(IV)]

- (G6) A change in ownership or operational control of this facility is treated as an administrative permit amendment if no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Division.

Reopening for Cause: [WAQSR Ch 6, Sec 3(d)(vii)] [W.S. 35-11-206(f)(ii) and (iv)]

- (G7) The Division will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:
- (a) Additional applicable requirements under the Clean Air Act or the WAQSR that become applicable to this source if the remaining permit term is three or more years. Such reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended.
 - (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - (c) The Division or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - (d) The Division or EPA determines that the permit must be revised or revoked to assure compliance with applicable requirements.

Annual Fee Payment: [WAQSR Ch 6, Sec 3(f)(i), (ii), and (vi)] [W.S. 35-11-211]

- (G8) The permittee shall, as a condition of continued operations, submit an annual fee to the Division as established in Chapter 6, Section 3 (f) of the WAQSR. The Division shall give written notice of the amount of fee to be assessed and the basis for such fee assessment annually. The assessed fee is due on receipt of the notice unless the fee assessment is appealed pursuant to W.S. 35-11-211(d). If any part of the fee assessment is not appealed it shall be paid to the Division on receipt of the written notice. Any remaining fee which may be due after completion of the appeal is immediately due and payable upon issuance of the Council's decision. Failure to pay fees owed the Division is a violation of Chapter 6, Section 3 (f) and W.S. 35-11-203 and may be cause for the revocation of this permit.

Annual Emissions Inventories: [WAQSR Ch 6, Sec 3(f)(v)(G)]

- (G9) The permittee shall submit an annual emission inventory for this facility to the Division for fee assessment and compliance determinations within 60 days following the end of the calendar year. The emissions inventory shall be in a format specified by the Division.

Severability Clause: [WAQSR Ch 6, Sec 3(h)(i)(E)]

(G10) The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

Compliance: [WAQSR Ch 6, Sec 3(h)(i)(F)(I) and (II)] [W.S. 35-11-203(b)]

(G11) The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act, Article 2 of the Wyoming Environmental Quality Act, and the WAQSR and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. It shall not be a defense for a 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 conditions of this permit.

Permit Actions: [WAQSR Ch 6, Sec 3(h)(i)(F)(III)] [W.S. 35-11-206(f)]

(G12) This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Property Rights: [WAQSR Ch 6, Sec 3(h)(i)(F)(IV)]

(G13) This permit does not convey any property rights of any sort, or any exclusive privilege.

Duty to Provide Information: [WAQSR Ch 6, Sec 3(h)(i)(F)(V)]

(G14) The permittee shall furnish to the Division, within a reasonable time, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permit, including information claimed and shown to be confidential under W.S. 35-11-1101 (a) of the Wyoming Environmental Quality Act. Upon request by the Division, the permittee shall also furnish confidential information directly to EPA along with a claim of confidentiality.

Emissions Trading: [WAQSR Ch 6, Sec 3(h)(i)(H)]

(G15) No permit revision is required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

Inspection and Entry: [WAQSR Ch 6, Sec 3(h)(iii)(B)] [W.S. 35-11-206(c)]

(G16) Authorized representatives of the Division, upon presentation of credentials and other documents as may be required by law, shall be given permission to:

- (a) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) have access to and copy at reasonable times any records that must be kept under the conditions of this permit;
- (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) sample or monitor any substances or parameters at any location, during operating hours, for the purpose of assuring compliance with this permit or applicable requirements.

Excess Emissions Due to an Emergency: [WAQSR Ch 6, Sec 3(I)]

(G17) The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency, as defined in Ch 6, Sec 3(l)(i) of the WAQSR. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (a) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
- (b) the permitted facility was, at the time, being properly operated;
- (c) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit;

- (d) The permittee submitted notice of the emergency to the Division within one working day of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

Diluting and Concealing Emissions: [WAQSR Ch 1, Sec 4]

- (G18) No person shall cause or permit the installation or use of any device, contrivance, or operational schedule which, without resulting in reduction of the total amount of air contaminant released to the atmosphere, shall dilute or conceal an emission from a source. This condition shall not apply to the control of odors.

Unavoidable Equipment Malfunction: [WAQSR Ch 1, Sec 5]

- (G19) (a) Any source believing that any emissions in excess of established regulation limits or standards resulted from an unavoidable equipment malfunction, shall notify the Division within 24 hours of the incident via telephone, electronic mail, fax, or other similar method. A detailed description of the circumstances of the incident as described in paragraph 5(a)(i)(A) Chapter 1, including a corrective program directed at preventing future such incidents, must be submitted within 14 days of the onset of the incident. The Administrator may extend this 14-day time period for cause.
- (b) The burden of proof is on the owner or operator of the source to provide sufficient information to demonstrate that an unavoidable equipment malfunction occurred.

Fugitive Dust: [WAQSR Ch 3, Sec 2(f)]

- (G20) The permittee shall minimize fugitive dust in compliance with standards in Ch 3, Sec 2(f) of WAQSR for construction/demolition activities, handling and transportation of materials, and agricultural practices.

Carbon Monoxide: [WAQSR Ch 3, Sec 5]

- (G21) The emission of carbon monoxide in stack gases from any stationary source shall be limited as may be necessary to prevent ambient standards from being exceeded.

Asbestos: [WAQSR Ch 3, Sec 8]

- (G22) The permittee shall comply with emission standards for asbestos during abatement, demolition, renovation, manufacturing, spraying and fabricating activities.
- (a) No owner or operator shall build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous dilutants to achieve compliance with a visible emissions standard, and the piecemeal carrying out of an operation to avoid coverage by a standard that applies only to operations larger than a specified size.
- (b) All owners and operators conducting an asbestos abatement project, including an abatement project on a residential building, shall be responsible for complying with Federal requirements and State standards for packaging, transportation, and delivery to an approved waste disposal facility as provided in paragraph (m) of Ch 3, Sec 8.
- (c) The permittee shall follow State and Federal standards for any demolition and renovation activities conducted at this facility, including:
- (i) A thorough inspection of the affected facility or part of the facility where the demolition or renovation activity will occur shall be conducted to determine the presence of asbestos, including Category I and Category II non-friable asbestos containing material. The results of the inspection will determine which notification and asbestos abatement procedures are applicable to the activity.
- (ii) The owner or operator shall follow the appropriate notification requirements of Ch 3, Sec 8(i)(ii).
- (iii) The owner or operator shall follow the appropriate procedures for asbestos emissions control, as specified in Chapter 3, Section 8(i)(iii).
- (d) No owner or operator of a facility may install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. The provisions of this paragraph do not apply to spray-applied insulating materials regulated under paragraph (j) of Ch 3, Sec 8.
- (e) The permittee shall comply with all other requirements of WAQSR Ch 3, Sec 8.

Open Burning Restrictions: [WAQSR Ch 10, Sec 2]

- (G23) The permittee conducting an open burn shall comply with all rules and regulations of the Wyoming Department of Environmental Quality, Division of Air Quality, and with the Wyoming Environmental Quality Act.
- (a) No person shall burn prohibited materials using an open burning method, except as may be authorized by permit. ***“Prohibited materials”*** means substances including, but not limited to; natural or synthetic rubber products, including tires; waste petroleum products, such as oil or used oil filters; insulated wire; plastic products, including polyvinyl chloride (“PVC”) pipe, tubing and connectors; tar, asphalt, asphalt shingles, or tar paper; railroad ties; wood, wood waste, or lumber that is painted or chemically treated; explosives or ammunition; batteries; hazardous waste products; asbestos or asbestos containing materials; or materials which cause dense smoke discharges, excluding refuse and flaring associated with oil and gas well testing, completions and well workovers.
 - (b) No person or organization shall conduct or cause or permit open burning for the disposal of trade wastes, for a salvage operation, for the destruction of fire hazards if so designated by a jurisdictional fire authority, or for fire fighting training, except when it can be shown by a person or organization that such open burning is absolutely necessary and in the public interest. Any person or organization intending to engage in such open burning shall file a request to do so with the Division.

Sulfur Dioxide Emission Trading and Inventory Program [WAQSR Ch 14]

- (G24) Any BART (Best Available Retrofit Technology) eligible facility, or facility which has actual emissions of SO₂ greater than 100 tpy in calendar year 2000 or any subsequent year, shall comply with the applicable requirements of WAQSR Ch 14, Sections 1 through 3, with the exceptions described in sections 2(c) and 3(a).

Stratospheric Ozone Protection Requirements: [40 CFR Part 82]

- (G25) The permittee shall comply with all applicable Stratospheric Ozone Protection Requirements, including but not limited to:
- (a) *Standards for Appliances* [40 CFR Part 82, Subpart F]
The permittee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - (i) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - (ii) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - (iii) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - (iv) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” is defined at §82.152).
 - (v) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.166.
 - (vi) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
 - (vii) The permittee shall comply with all other requirements of Subpart F.
 - (b) *Standards for Motor Vehicle Air Conditioners* [40 CFR Part 82, Subpart B]
If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

STATE ONLY PERMIT CONDITIONS
(modified June 16, 2014)

The conditions listed in this section are State only requirements and are not federally enforceable.

Ambient Standards

(S1) The permittee shall operate the emission units described in this permit such that the following ambient standards are not exceeded:

POLLUTANT	STANDARD	CONDITION	WAQSR CH-2, SDC
PM ₁₀ particulate matter	50 micrograms per cubic meter	annual arithmetic mean	2 (a)
	150 micrograms per cubic meter	24-hr average concentration with not more than one exceedance per year	
PM _{2.5} particulate matter	15 micrograms per cubic meter	annual arithmetic mean	2 (b)
	35 micrograms per cubic meter	98 th percentile 24-hour average concentration	
Nitrogen dioxide	<u>53 parts per billion</u>	<u>annual average concentration</u>	3
	<u>100 parts per billion</u>	<u>three-year average of the annual 98th percentile of the daily maximum 1-hr average concentration</u>	
	<u>0.053 parts per million</u>	<u>annual arithmetic mean</u>	
Sulfur dioxide	<u>75 parts per billion</u>	<u>three-year average of the annual (99th percentile) of the daily max 1-hr average</u>	4
	<u>0.5 parts per million</u>	<u>3-hr blocks not to be exceeded more than once per calendar year</u>	
Carbon monoxide	10 milligrams per cubic meter	max 8-hr concentration with not more than one exceedance per year	5
	40 milligrams per cubic meter	max 1-hr concentration with not more than one exceedance per year	
Ozone	<u>0.075 parts per million</u>	<u>three-year average of the annual fourth-highest daily maximum 8-hr average concentration</u>	6
Hydrogen sulfide	70 micrograms per cubic meter	½ hour average not to be exceeded more than two times per year	7
	40 micrograms per cubic meter	½ hour average not to be exceeded more than two times in any five consecutive days	
Suspended sulfate	0.25 milligrams SO ₃ per 100 square centimeters per day	maximum annual average	8
	0.50 milligrams SO ₃ per 100 square centimeters per day	maximum 30-day value	
Lead and its compounds	0.15 micrograms per cubic meter	maximum arithmetic 3-month mean concentration for a 3-year period	10

***Exceedances of these standards shall be determined using the procedures in 40 CFR 50.**

Hydrogen Sulfide: [WAQSR Ch 3, Sec 7]

- (S2) Any exit process gas stream containing hydrogen sulfide which is discharged to the atmosphere from any source shall be vented, incinerated, flared or otherwise disposed of in such a manner that ambient sulfur dioxide and hydrogen sulfide standards are not exceeded.

Odors: [WAQSR Ch 2, Sec 11]

- (S3) (a) The ambient air standard for odors from any source shall be limited to an odor emission at the property line which is undetectable at seven dilutions with odor free air as determined by a scentometer as manufactured by the Barnebey-Cheney Company or any other instrument, device, or technique designated by the Division as producing equivalent results. The occurrence of odors shall be measured so that at least two measurements can be made within a period of one hour, these determinations being separated by at least 15 minutes.
- (b) Odor producing materials shall be stored, transported, and handled in a manner that odors produced from such materials are confined and that accumulation of such materials resulting from spillage or other escape is prevented.

SUMMARY OF SOURCE EMISSION LIMITS AND REQUIREMENTS

(modified September 24, 2012)

Source ID#: **Unit 1**

Source Description: **Rotary Hearth Calciner and Discharge Table (main stack) (modified June 16, 2014)**

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	20 percent opacity [F4] 22.0 lb/hr [F5]	WAQSR Ch 3, Sec 2; WAQSR Ch 6, Sec 2 Permit MD-208	Once every five years [F8]	Quarterly Method 9 observations [F11] Daily CAM [F12]	Record the results of any testing [F16] Record visible emissions monitoring results [F16] Record CAM results [F18]	Report testing results [F21] Report visible emissions and CAM monitoring semiannually [F22] Report excess emissions and permit deviations [F24]
Various	Comply with all applicable requirements of 40 CFR Part 60 Subparts A & Y and WAQSR Ch 5 Sec 2					

Source ID#: **Unit 1PFB**

Source Description: **Propane Fired Burner (located in afterburner of Main Stack) (modified June 16, 2014)**

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
NO_x and CO	Use during cold start-ups only [F6] Limit operation hours to 300 per year [F6]	WAQSR Ch 6, Sec 2 Permit MD-13965	Testing if required [F9]	Monitor operating hours [F13]	Record monitoring results [F16]	Report monitoring [F22] Report excess emissions and permit deviations [F24]

Source ID#: **Unit 2**

Source Description: **Fines Baghouse**

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	20 percent opacity [F4] 1.0 lb/hr [F5]	WAQSR Ch 3, Sec 2; WAQSR Ch 6, Sec 2 Waiver AP-7566	Testing if required [F9]	Daily Method 22-like observations [F11]	Record the results of any additional testing [F16] Record visible emissions monitoring results [F16]	Report visible emissions monitoring semiannually [F22] Report excess emissions and permit deviations [F24]
Various	Comply with all applicable requirements of 40 CFR Part 60 Subparts A & Y and WAQSR Ch 5 Sec 2					

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

Source ID#: Unit 5

Source Description: Coke Loadout Baghouse

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	20 percent opacity [F4] 0.01 gr/dscf, 2.6 lb/hr [F5]	WAQSR Ch 3, Sec 2; WAQSR Ch 6, Sec 2 Waiver AP-3023	Testing if required [F9]	Daily Method 22-like observations [F11] Daily CAM [F12]	Record the results of any testing [F16] Record visible emissions monitoring results [F16] Record CAM results [F18]	Report visible emissions and CAM monitoring semiannually [F22] Report excess emissions and permit deviations [F24]
Various	Comply with all applicable requirements of 40 CFR Part 60 Subparts A & Y and WAQSR Ch 5 Sec 2					

Source ID#: Unit 4

Source Description: Fugitive Emissions

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	Minimize fugitive dust emissions [F2]	7/19/1991 Division Letter	None	Monitor fugitive dust emissions and control measures [F10]	Record fugitive dust control measures [F15]	Annual fugitive emissions report [F20] Report excess emissions and permit deviations [F24]

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

Source ID#: Unit 6

Source Description: EPA Tier 3 certified, Caterpillar D125-6 Emergency Diesel Generator Engine

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	30 percent opacity [F4]	WAQSR Ch 3, Sec 2	Testing if required [F9]	Semiannual observation [F11]	Record monitoring results and any additional testing [F16]	Report excess emissions and permit deviations [F24]
Various	Limit operation hours to 570 per year [F6]	WAQSR Ch 6, Sec 2 Waiver wv-12445	Testing if required [F9]	Monitor operating hours [F13]	Record monitoring results [F16] Record certification [F17]	Report monitoring [F22] Report excess emissions and permit deviations [F24]
NO _x , CO, PM, HC	Comply with all applicable requirements of 40 CFR Part 60 Subparts A & IIII and WAQSR Ch 5 Sec 2					
HAPs	Comply with all applicable requirements of 40 CFR Part 63 Subparts A & ZZZZ and WAQSR Ch 5 Sec 3					

Source ID#: N/A

Source Description: Coke Product Surge Pile

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	Annual throughput 3,000 tons [F5]	WAQSR Ch 3, Sec 2; WAQSR Ch 6, Sec 2 Waiver AP-6579	None	Monitor throughput [F8]	Record amount annual throughput [F12]	Report annual throughput [F16] Report excess emissions and permit deviations [F20]
Various	Comply with all applicable requirements of 40 CFR Part 60 Subparts A & Y and WAQSR Ch 5 Sec 2					

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

ABBREVIATIONS

ACFM	Actual cubic feet per minute
AFRC	Air-fuel ratio controls
AQD	Air Quality Division
BACT	Best available control technology (see Definitions)
Btu	British Thermal Unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CI	Compression Ignition
CO	Carbon Monoxide
DEQ	Wyoming Department of Environmental Quality
EPA	United States Environmental Protection Agency (see Definitions)
ESP	Electrostatic Precipitator
g/hp-hr	Gram(s) per horsepower hour
gal	Gallon(s)
gr	Grain(s)
H ₂ S	Hydrogen sulfide
HAP(s)	Hazardous air pollutant(s)
hp	Horsepower
hr	Hour(s)
lb	Pound(s)
M	Thousand
MACT	Maximum available control technology (see Definitions)
mfr	Manufacturer
mg	Milligram(s)
MM	Million
MVACs	Motor vehicle air conditioners
NMHC(s)	Non-methane hydrocarbon(s)
NO _x	Oxides of nitrogen
NSCR	Non-selective catalytic reduction
O ₂	Oxygen
PM	Particulate matter
PM ₁₀	Particulate matter less than or equal to a nominal diameter of 10 micrometers
ppmv	Parts per million (by volume)
ppmw	Parts per million (by weight)
QIP	Quality Improvement Plan
RICE	Reciprocating Internal Combustion Engine
SCF	Standard cubic foot (feet)
SCFD	Standard cubic foot (feet) per day
SCM	Standard cubic meter(s)
SI	Spark Ignition
SIC	Standard Industrial Classification
SO ₂	Sulfur dioxide
SO _x	Oxides of sulfur
TPH	Ton(s) per hour
TPY	Tons per year
U.S.C.	United States Code
µg	Microgram(s)
VOC(s)	Volatile organic compound(s)
W.S.	Wyoming Statute
WAQSR	Wyoming Air Quality Standards & Regulations (see Definitions)
2SLB	2-stroke lean burn
4SLB, 4SRB	4-stroke lean burn, 4-stroke rich burn

DEFINITIONS

"Act" means the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.*

"Administrator" means Administrator of the Air Quality Division, Wyoming Department of Environmental Quality.

"Applicable requirement" means all of the following as they apply to emissions units at a source subject to Chapter 6, Section 3 of the WAQSR (including requirements with future effective compliance dates that have been promulgated or approved by the EPA or the State through rulemaking at the time of issuance of the operating permit):

- (a) Any standard or other requirement provided for in the Wyoming implementation plan approved or promulgated by EPA under title I of the Act that implements the relevant requirements of the Act, including any revisions to the plan promulgated in 40 CFR Part 52;
- (b) Any standards or requirements in the WAQSR which are not a part of the approved Wyoming implementation plan and are not federally enforceable;
- (c) Any term or condition of any preconstruction permits issued pursuant to regulations approved or promulgated through rulemaking under title I, including parts C or D of the Act and including Chapter 5, Section 2 and Chapter 6, Sections 2 and 4 of the WAQSR;
- (d) Any standard or other requirement promulgated under Section 111 of the Act, including Section 111(d) and Chapter 5, Section 2 of the WAQSR;
- (e) Any standard or other requirement under Section 112 of the Act, including any requirement concerning accident prevention under Section 112(r)(7) of the Act and including any regulations promulgated by EPA and the State pursuant to Section 112 of the Act;
- (f) Any standard or other requirement of the acid rain program under title IV of the Act or the regulations promulgated thereunder;
- (g) Any requirements established pursuant to Section 504(b) or Section 114(a)(3) of the Act concerning enhanced monitoring and compliance certifications;
- (h) Any standard or other requirement governing solid waste incineration, under Section 129 of the Act;
- (i) Any standard or other requirement for consumer and commercial products, under Section 183(e) of the Act (having to do with the release of volatile organic compounds under ozone control requirements);
- (j) Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under title VI of the Act, unless the EPA has determined that such requirements need not be contained in a title V permit;
- (k) Any national ambient air quality standard or increment or visibility requirement under part C of title I of the Act, but only as it would apply to temporary sources permitted pursuant to Section 504(e) of the Act; and
- (l) Any state ambient air quality standard or increment or visibility requirement of the WAQSR.
- (m) Nothing under paragraphs (A) through (L) above shall be construed as affecting the allowance program and Phase II compliance schedule under the acid rain provision of Title IV of the Act.

"BACT" or "Best available control technology" means an emission limitation (including a visible emission standard) based on the maximum degree of reduction of each pollutant subject to regulation under the WAQSR or regulation under the Federal Clean Air Act, which would be emitted from or which results for any proposed major emitting facility or major modification which the Administrator, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application or production processes and available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant. If the Administrator determines that technological or economic limitations on the application of measurement methodology to a particular class of sources would make the imposition of an emission standard infeasible, he may instead prescribe a design,

equipment, work practice or operational standard or combination thereof to satisfy the requirement of Best Available Control Technology. Such standard shall, to the degree possible, set forth the emission reduction achievable by implementation of such design, equipment, work practice, or operation and shall provide for compliance by means which achieve equivalent results. Application of BACT shall not result in emissions in excess of those allowed under Chapter 5, Section 2 of the WAQSR and any other new source performance standard or national emission standards for hazardous air pollutants promulgated by EPA but not yet adopted by the state.

"Department" means the Wyoming Department of Environmental Quality or its Director.

"Director" means the Director of the Wyoming Department of Environmental Quality.

"Division" means the Air Quality Division of the Wyoming Department of Environmental Quality or its Administrator.

"Emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

"EPA" means the Administrator of the U.S. Environmental Protection Agency or the Administrator's designee.

"Fuel-burning equipment" means any furnace, boiler apparatus, stack, or appurtenances thereto used in the process of burning fuel or other combustible material for the purpose of producing heat or power by indirect heat transfer.

"Fugitive emissions" means those emissions which could not reasonably pass through a stack chimney, vent, or other functionally equivalent opening.

"Insignificant activities" means those activities which are incidental to the facility's primary business activity and which result in emissions of less than one ton per year of a regulated pollutant not included in the Section 112 (b) list of hazardous air pollutants or emissions less than 1000 pounds per year of a pollutant regulated pursuant to listing under Section 112 (b) of the Act provided, however, such emission levels of hazardous air pollutants do not exceed exemptions based on insignificant emission levels established by EPA through rulemaking for modification under Section 112 (g) of the Act.

"MACT" or "Maximum achievable control technology" means the maximum degree of reduction in emissions that is deemed achievable for new sources in a category or subcategory that shall not be less stringent than the emission control that is achieved in practice by the best controlled similar source, as determined by the Administrator. Emission standards promulgated for existing sources in a category or subcategory may be less stringent than standards for new sources in the same category or subcategory but shall not be less stringent, and may be more stringent than:

- (a) the average emission limitation achieved by the best performing 12 percent of the existing sources (for which the Administrator has emission information), excluding those sources that have, within 18 months before the emission standard is proposed or within 30 months before such standard is promulgated, whichever is later, first achieved a level of emission rate or emission reduction which complies, or would comply if the source is not subject to such standard, with the lowest achievable emission rate applicable to the source category and prevailing at the time, in the category or subcategory for categories and subcategories with 30 or more sources, or
- (b) the average emission limitation achieved by the best performing five sources (for which the Administrator has or could reasonably obtain emissions information) in the category or subcategory for categories or subcategories with fewer than 30 sources.

"Modification" means any physical change in, or change in the method of operation of, an affected facility which increases the amount of any air pollutant (to which any state standards applies) emitted by such facility or which results in the emission of any such air pollutant not previously emitted.

"Permittee" means the person or entity to whom a Chapter 6, Section 3 permit is issued.

"Potential to emit" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant,

including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation is enforceable by EPA and the Division. This term does not alter or affect the use of this term for any other purposes under the Act, or the term "capacity factor" as used in title IV of the Act or the regulations promulgated thereunder.

"Regulated air pollutant" means the following:

- (a) Nitrogen oxides (NO_x) or any volatile organic compound;
- (b) Any pollutant for which a national ambient air quality standard has been promulgated;
- (c) Any pollutant that is subject to any standard established in Chapter 5, Section 2 of the WAQSR or Section 111 of the Act;
- (d) Any Class I or II substance subject to a standard promulgated under or established by title VI of the Act; or
- (e) Any pollutant subject to a standard promulgated under Section 112 or other requirements established under Section 112 of the Act, including Sections 112(g), (j), and (r) of the Act, including the following:
 - (i) Any pollutant subject to requirements under Section 112(j) of the Act. If EPA fails to promulgate a standard by the date established pursuant to Section 112(e) of the Act, any pollutant for which a subject source would be major shall be considered to be regulated on the date 18 months after the applicable date established pursuant to Section 112(e) of the Act; and
 - (ii) Any pollutant for which the requirements of Section 112(g)(2) of the Act have been met, but only with respect to the individual source subject to Section 112(g)(2) requirement.
- (f) Pollutants regulated solely under Section 112(r) of the Act are to be regulated only with respect to the requirements of Section 112(r) for permits issued under this Chapter 6, Section 3 of the WAQSR.

"Renewal" means the process by which a permit is reissued at the end of its term.

"Responsible official" means one of the following:

- (a) For a corporation:
 - (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
 - (ii) A duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (A) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or
 - (B) the delegation of authority to such representative is approved in advance by the Division;
- (b) For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- (c) For a municipality, State, Federal, or other public agency: Either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency; or
- (d) For affected sources:
 - (i) The designated representative or alternate designated representative in so far as actions, standards, requirements, or prohibitions under title IV of the Act or the regulations promulgated thereunder are concerned; and
 - (ii) The designated representative, alternate designated representative, or responsible official under Chapter 6, Section 3 (b)(xxvi) of the WAQSR for all other purposes under this section.

"WAQSR" means the Wyoming Air Quality Standards and Regulations promulgated under the Wyoming Environmental Quality Act, W.S. §35-11-101, *et seq.*

APPENDIX A
Compliance Assurance Monitoring (CAM) Plan
(modified June 16, 2014)

Attachment B1: Unit 1 CAM Plan

Emission Unit 1 is the rotary hearth calciner and discharge table, which exhausts air from the coker. Unit 1 has an emission limit of 22.0 pounds of particulate matter per hour; uncontrolled emissions are greater than 100 tons per year. Four control devices contribute to reducing particulate matter emissions:

- 1) A baghouse capable of accommodating 51,000 acfm (but actually controlling only about 30,000 acfm at 300°F) was installed in 1997 to control emissions from the coke cooler exhaust.
- 2) Six ceramic cyclones installed in two banks of three were installed in 1999. The cyclones are capable of accommodating up to 275,000 acfm (at 2,250°F). Testing has indicated that only three cyclones are needed to meet the particulate matter emission limit, so a combination of three cyclones from the two banks is employed at any given time.
- 3) Gases exhausted by the coke cooler baghouse and the high temperature cyclones are combined and passed through an afterburner. Air is introduced to the afterburner to provide the oxygen necessary to initiate combustion of fine particulate matter, semi-volatiles, and any volatile gases in the oxygen-starved gases from the coker and coke cooler. After passing through the afterburner, gases are drawn out a 135 foot tall stack.
- 4) A 55 MMBTU propane-fired burner is located in the throat of the afterburner. This burner (Unit 1PFB) is to be used during cold startups only and is limited to 300 hours of annual operations (MD-13965).

Each of the four different control devices contributes to controlling particulate matter emissions from the main stack. However, this CAM plan has only three components since the propane-fired burner is physically located within the afterburner and is not a separate unit.

Main Baghouse

I. Background

A. Emissions Unit

Description: Calciner table and coke cooler
Identification: Unit 1: Rotary Hearth Calciner and Discharge Table
Facility: P4 Production, LLC
Rock Springs, Wyoming

B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements

Regulation: MD - 208
CAM Emission limits: (filterable) particulate matter: 22.0 lb/hr
Pre-CAM monitoring requirements: Visible emissions, periodic monitoring (Method 22)

C. Control Technology, Capture System, Bypass, PTE

Controls: Four cyclones precede pulse-jet baghouse operated under negative pressure.
Capture System: Closed-duct system (coke cooler is enclosed)
Bypass: Baghouse can be bypassed to afterburner
PTE before controls: Unit 1 has a PTE of greater than 100 TPY
PTE after controls: 96.4 TPY (22.0 lb/hr for 8,760 hours)

II. Monitoring Approach

A. Indicators

Pressure drop will be used as an indicator of baghouse performance.

B. Measurement Approach

Pressure drop will be monitored with a manometer. Rock Springs staff will record pressure drop across the coke cooler baghouse and check operation of the pulse blower and airlock auger daily. Observations will be recorded on daily log sheets.

C. Indicator Range

An excursion is defined as measured pressure drop less than 4.0 or greater than 7.5 inches of water.

D. Performance Criteria

Data Representativeness: Pressure drop measurements across the baghouse provide an excellent indicator of baghouse integrity.

QA/QC Practices and Criteria: Log sheets will be retained by the plant superintendent.

III. Response to Excursion

A. Upon noting excursions beyond the pressure drop indicator range or malfunctions of the pulse blower or airlock auger, the observer will immediately notify maintenance to inspect

the baghouse. Maintenance personnel will inspect the baghouse and make needed repairs as soon as practicable.

Justification

I. Background

The pollutant-specific emission unit is the rotary coker, which is the primary production unit at the site. A Western Pneumatic pulse-jet baghouse with 542 bags filters a small fraction of the exhaust gases from the coker (approximately 30,000 acfm). The coke cooler has a closed-vent system to the baghouse. The baghouse can be bypassed.

II. Rationale for Selection of Performance Indicators

Monitoring pressure drop was selected as the performance indicator because it is indicative of good operation and maintenance of the baghouse. Monitoring visible emissions from the baghouse is not possible because exhausted air is combined with air from the coker before being exhausted from the main stack. Thus, there is no direct indicator of performance by the baghouse but maintaining pressure drop within the appropriate range and monitoring the operation of the pulse blower and airlock auger ensures the baghouse is operating properly.

III. Rationale for Selection of Indicator Ranges

The selected indicator range of 4.0 and 7.5 inches of water is based on good engineering judgment. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported.

High Temperature Cyclones

I. Background

A. Emissions Unit

Description: Coker
Identification: Unit 1; Rotary Hearth Calciner and Discharge Table
Facility: P4 Production, LLC
Rock Springs, Wyoming

B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements

Regulation: MD - 208
CAM Emission limits: (filterable) particulate matter: 22.0 lb/hr
Pre-CAM monitoring requirements: Visible emissions, periodic monitoring (Method 22)

C. Control Technology, Capture System, Bypass, PTE

Controls: High temperature cyclones.
Capture System: Closed-duct system
Bypass: None
PTE before controls: Unit 1 has a PTE of greater than 100 TPY
PTE after controls: 96.4 TPY (22.0 lb/hr for 8,760 hours)

II. Monitoring Approach

A. Indicators

Pressure drop will be used as an indicator of the cyclone performance.

B. Measurement Approach

Pressure drop will be monitored with a manometer. Rock Springs staff will record pressure drop across the inlet and east/west cyclone banks daily. Observations will be recorded on daily log sheets.

C. Indicator Range

An excursion is defined as measured pressure drop less than 0.4 inches of water.

D. Performance Criteria

Data Representativeness: Pressure drop measurements across the cyclone provide an excellent indicator of cyclone effectiveness

QA/QC Practices and Criteria: Log sheets will be retained by the plant superintendent.

III. Response to Excursion

A. Upon noting excursions below the minimum pressure drop, the observer will immediately notify maintenance to inspect the cyclone system. Maintenance personnel will inspect the cyclones and make needed repairs or adjustments as soon as practicable.

Justification

I. Background

The pollutant-specific emission unit is the rotary coker, which is the primary production unit at the site. The cyclones accommodate the entire gas stream from the top of the coker (up to 275,000 acfm at 2,250°F). The coke cooler has a closed-vent system to the cyclone, so there is no means for the cyclone to be bypassed.

II. Rationale for Selection of Performance Indicators

Monitoring pressure drop was selected as the performance indicator for the cyclones because it is indicative of good operation. Control efficiency is a function of inlet velocity, and changes in velocity result in changes in pressure drop across device; pressure drop is measured as an indicator of the appropriate inlet velocity. Temperature is also monitored to ensure the cyclones are not exposed to excessive heat, which could adversely affect the integrity of the cyclones. Monitoring visible emissions from the cyclone is not possible because exhausted air is combined with air from the coke cooler baghouse before being exhausted from the main stack. Thus, there is no direct indicator of performance by the cyclone but maintaining pressure drop above 0.4 inches water ensures the cyclones are operating properly.

III. Rationale for Selection of Indicator Ranges

P4 has determined through source testing that operating the cyclones with a pressure drop greater than 0.4 inches water ensures compliance with the 22.0 pound per hour mass emission limit. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported.

Afterburner

I. Background

A. Emissions Unit

Description: Coker
Identification: Unit 1: Rotary Hearth Calciner and Discharge Table
Unit 1PFB – 55 MMBTU propane-fired burner
Facility: P4 Production, LLC
Rock Springs, Wyoming

B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements

Regulation: MD – 208 and MD-13965
CAM Emission limits: (filterable) particulate matter: 22 lb/hr
Pre-CAM monitoring requirements: Visible emissions, periodic monitoring (Method 22)

C. Control Technology, Capture System, Bypass, PTE

Controls: Afterburner
Capture System: Closed-duct system
Bypass: None
PTE before controls: Unit 1 has a PTE of greater than 100 TPY
PTE after controls: 96.4 TPY (22.0 lb/hr for 8,760 hours)

II. Monitoring Approach

A. Indicators

Downcomer (afterburner outlet) temperature is used as an indicator of the afterburner.

B. Measurement Approach

The temperature at the downcomer (afterburner outlet) is measured at two locations. The plant's Delta V computer control system continuously monitors the temperature and varies the quantity of dilution air to maintain an average downcomer (afterburner outlet) temperature range of 1800 °F to 1950°F.

C. Indicator Range

The afterburner has been found to operate effectively at temperatures ranging from 1,700°F to 2,350°F. Temperatures above 2,350°F endanger the integrity of the materials of construction. An excursion is defined as measured average temperature less than 1,700°F or greater than 2,350°F.

A 55 MMBTU propane-fired burner is located in the throat of the afterburner. This burner will be used during cold startups to reduce start-up opacity. It is limited to 300 hours of annual operation.

D. Performance Criteria

Data Representativeness: Temperature measurements have proven to provide an excellent indicator of afterburner effectiveness in numerous industrial facilities.

QA/QC Practices and Criteria: Log sheets will be retained by the plant superintendent.

III. Response to Excursion

- A. Upon noting excursions outside the indicator range, the plant operator will immediately notify maintenance to inspect the afterburner system. Maintenance personnel will inspect the afterburner and make needed repairs or adjustments as soon as practicable.

Justification

I. Background

The pollutant-specific emission unit is the rotary coker, which is the primary production unit at the site. The afterburner accommodates the entire gas stream from the top of the coker and the coke cooler.

II. Rationale for Selection of Performance Indicators

P4 employs an afterburner to combust any remaining volatile or semi-volatile compounds and any organic particulate matter in the coker exhaust stream. Important design factors include residence time (sufficient time for the combustion reaction to occur), temperature (a temperature high enough to ignite the material), and turbulence (turbulent mixing of the air and waste-fuel). Time, temperature, turbulence, and sufficient oxygen concentration govern the completeness of the combustion reaction. Of these, only temperature and oxygen can be significantly controlled after construction. Time and turbulence are fixed by incinerator design and flow rate can be controlled only over a limited range.

III. Rationale for Selection of Indicator Ranges

P4 has determined through source testing that operating the afterburners above 1,700°F, in concert with proper operation of the coke cooler baghouse and high temperature cyclones, ensures compliance with the 22.0 pound per hour mass emission limit. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported.

Unit 5: Coke Loadout Baghouse CAM Plan

I. Background

A. Emissions Unit

Description: Coke Conveyance
Identification: Unit 5: Coke Loadout Baghouse
Facility: P4 Production, LLC
Rock Springs, Wyoming

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation: AP-3023
CAM Emission Limit: (filterable) particulate matter: 0.01 gr/dscf, 2.6 lb/hr,
11.3 tpy
Pre-CAM Monitoring Requirements: Visible emissions, periodic monitoring (Method 22)

C. Control Technology, Capture System, Bypass, PTE

Controls: Pulse-jet baghouse operated under negative pressure
Capture System: Closed-duct system
Bypass: None
PTE before controls: 2,250 tpy
PTE after controls: 11.3 tpy

II. Monitoring Approach

A. Indicators

Visible emissions will be used as an indicator. Normal process operations will not produce conditions that adversely affect the baghouse, so no process operational parameters will be monitored.

B. Measurement Approach

Visible emissions from the baghouse exhaust will be monitored daily using EPA Reference Method 22-like procedures. The visual observations will be made by a person who is educated on the general procedures for determining the presence of visible emissions, but not necessarily certified to perform Method 9 observations. Observations will be recorded in a daily log sheet by the observer.

C. Indicator Range

An excursion is defined as the presence of visible emissions.

D. Performance Criteria

Data Representativeness: Measurements are being made at the emission point (baghouse exhaust).

QA/QC Practices and Criteria: The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.

III. Response to Excursion

- A. Upon noting visible emissions, the observer will immediately notify maintenance to inspect the baghouse. Maintenance personnel will inspect the baghouse and make needed repairs as soon as practicable.