

CONSTRUCTION PERMIT SUMMARY REPORT

Company Name: EM Resources LLC dba EM
Resources - Gorman Woodyard Fly
Ash Transloading File Number: 43-0127 EPS Initials: GJF
Permit Number(s): 980655 Source Point Number(s): 1 & 2
Application Received (date): August 8, 2022 Application Complete (date): August 18, 2022
Air Quality Analysis Performed? Yes ☐ No ☒

Briefly describe the project: (new source, modifications) (what the process is) (type controls proposed) (emissions expected, qualitative) (replacing what sources) (background information)

Project Description: This is a new facility, and it will be a true minor source. The EM Resources LLC Facility will use two portable fly ash transloaders to convey fly ash from tanker trucks to railcars. There will be particulate emissions, and some of the PM will consist of HAPs. The units are each mounted on a mobile trailer that is equipped with a gasoline powered generator for electricity and a gasoline powered compressor for material transfer. The units are not self-propelled. Fly ash will be transferred from tanker trucks to railcars via pneumatic transfer. Material handling will be enclosed, and emissions from each transloader will be controlled by baghouse. The engines associated with this source are portable and meet the definition of “nonroad engines” found at 40 CFR 1068. Therefore, these engines are not subject to 40 CFR 63 Subpart ZZZZ or 40 CFR 60 Subpart JJJJ, provided that these mobile units shall not operate for more than 12 consecutive months at one location on the premises of the permitted facility.

In a submittal dated August 10, 2022, the company indicated that “Both mobile fly ash transloaders planned for this location shall not operate for more than twelve consecutive months without being moved in order to maintain their classification as “nonroad engines.”

There are no applicable NSPS or NESHAP rules that affect this source. This facility is not one of the 29 categories specified at TAPCR 1200-03-09-.01(4)(b)1(i).

The company stated that these units would be moved between this site and several other sites periodically. A letter from the Division dated August 22, 2022, states that the engines associated with this source are considered as “nonroad engines” and that permits would not be required.

Humphreys County is not a permit registry county.

Rules Analysis

Title V ☐ Cond. Major ☐ Minor ☒ Source category listed in 1200-3-9-.01(4)(b)1.(i)? Yes ☐ No ☒

Reason for PSD:	New source above _____ TPY	<input type="checkbox"/>	Sig. increase in _____ emissions	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Applicable NSPS:	40 CFR Part 60, Subpart _____	<input type="checkbox"/>	State Rule 1200-3-16-. _____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Applicable NESHAP:	40 CFR Part 61, Subpart _____	<input type="checkbox"/>	State Rule 1200-3-11-. _____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Applicable NESHAP:	40 CFR Part 63, Subpart _____	<input type="checkbox"/>	State Rule 1200-3-31-. _____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

Other Applicable State Rules

TSP Emissions:	1200-3-	<u>7</u>	-.	<u>04(2)</u>	<input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	NO _x Emissions:	1200-3-	_____	-.	_____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
SO ₂ Emissions:	1200-3-	_____	-.	_____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	Lead Emissions:	1200-3-	_____	-.	_____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
CO Emissions:	1200-3-	_____	-.	_____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	_____ Emissions:	1200-3-	_____	-.	_____	<input type="checkbox"/>	N/A <input type="checkbox"/>
VOC Emissions:	1200-3-	_____	-.	_____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	_____ Emissions:	1200-3-	_____	-.	_____	<input type="checkbox"/>	N/A <input type="checkbox"/>

Visible Emissions from _____ Source not to exceed 20 % opacity per Method 9 (Rule 1200-3- 05 -.01(1))
(Rule 1200-3- 05 -.03(6))

43-0127-01**Emission Summary****Permit Number:** 980655

Transloader #1 / TR#1 with baghouse

Source Status: New ☒ Modification ☐ Expansion ☐ Relocation ☐ **Permit Status:** New ☒ Renewal ☐PSD ☐ NSPS ☐ NESHAPs ☐ **Previous Permit Number:** Construction _____ Operating _____

	Pounds/Hour			Tons/Year				Date of Data	*	Applicable 1200-03-
	Actual	Potential	Allowable	Actual	Potential	Allowable	Net Change			
PM	0.445	0.445	4.29	0.178	1.95	18.8		8-8-2022	3	07-.04(2) 0.25 gr/dscf
Single HAP					0.00039 (P)			8-8-2022	3	
Com-bined HAP					0.00099			8-8-2022	3	

* - Source of data is from the application dated August 8, 2022, with additional information dated August 9, 10, and 18, 2022

PERMITTING PROGRAM: GJF DATE: September 28, 2022

43-0127-02**Emission Summary****Permit Number:** 980655

Transloader #2/ TR#2with baghouse

Source Status: New ☒ Modification ☐ Expansion ☐ Relocation ☐**Permit Status:** New ☒ Renewal ☐PSD ☐ NSPS ☐ NESHAPs ☐**Previous Permit Number:** **Construction** _____ **Operating** _____

	Pounds/Hour			Tons/Year				Date of Data	*	Applicable 1200-03-
	Actual	Potential	Allowable	Actual	Potential	Allowable	Net Change			
PM	0.445	0.445	4.29	0.178	1.95	18.8		8-8-2022	3	07-.04(2) 0.25 gr/dscf
Single HAP					0.00039 (P)			8-8-2022	3	
Com-bined HAP					0.00099			8-8-2022	3	

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PERMITTING PROGRAM: GJF DATE: September 28, 2022

Allowable / Potential TPY plantwide

Source 43-0127	Description	Potential tons per year PM	Potential tons per year single HAP (phosphorus)	Potential tons per year Combined HAP
01	Transloader #1	18.8	0.00039	0.00099
02	Transloader #2	18.8	0.00039	0.00099
Total		37.6	0.00078	0.00198