



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Scott J. Nally, Director

7/16/2013

William Rosby  
 ROSBY RESOURCE RECYCLING, INC.  
 4963 Schaaf Lane  
 Brooklyn Heights, OH 44131

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318118050  
 Permit Number: P0110665  
 Permit Type: Initial Installation  
 County: Cuyahoga

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

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

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: CDAQ



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ROSBY RESOURCE RECYCLING, INC.**

Facility ID:	1318118050
Permit Number:	P0110665
Permit Type:	Initial Installation
Issued:	7/16/2013
Effective:	7/16/2013
Expiration:	7/16/2018





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
ROSBY RESOURCE RECYCLING, INC.

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## Authorization

Facility ID: 1318118050  
Application Number(s): A0045372  
Permit Number: P0110665  
Permit Description: FEPTIO initial installation for Rosby Resource Recycling, Inc. (1318118050) which consists of equipment that are used to process assorted construction debris for recycling, composting, and mulch products. Emissions units include F002, deck shaker and separator; F004, slow-speed shredder; F005, power screener; F006, Trommel screener; F007 Trommel screener; F008, storage piles; P001 and P002, identical 243 HP diesel generators.  
Permit Type: Initial Installation  
Permit Fee: \$1,600.00  
Issue Date: 7/16/2013  
Effective Date: 7/16/2013  
Expiration Date: 7/16/2018  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ROSBY RESOURCE RECYCLING, INC.  
54 E SCHAAF RD  
Brooklyn Heights, OH 44131

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

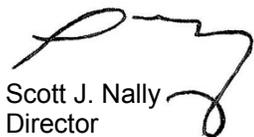
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality  
2nd Floor  
75 Erieview Plaza  
Cleveland, OH 44114  
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0110665

Permit Description: FEPTIO initial installation for Rosby Resource Recycling, Inc. (1318118050) which consists of equipment that are used to process assorted construction debris for recycling, composting, and mulch products. Emissions units include F002, deck shaker and separator; F004, slow-speed shredder; F005, power screener; F006, Trommel screener; F007 Trommel screener; F008, storage piles; P001 and P002, identical 243 HP diesel generators.

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

<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>F002</b> Picking Line: Erin (2) Deck Shaker and Redox Separator. ----- Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>F004</b> Doppstadt 3060K Slow Speed Grinder ----- Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>F005</b> Warrior Power Screener ----- Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>F006</b> 726 Trommel Screen Doppstadt ----- Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>F007</b> 617 Trommel Screen Doppstadt ----- Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>F008</b> Storage Piles and Load-In and Load-Out ----- Not Applicable

**Group Name: Diesel Generators**

<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>P001</b> (1) 243 HP Diesel Generator for Picking Line ----- Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>P002</b> (2) 243 HP Diesel Generator for Picking Line ----- Not Applicable



**Final Permit-to-Install and Operate**  
ROSBY RESOURCE RECYCLING, INC.  
**Permit Number:** P0110665  
**Facility ID:** 1318118050  
**Effective Date:** 7/16/2013

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
ROSBY RESOURCE RECYCLING, INC.  
**Permit Number:** P0110665  
**Facility ID:** 1318118050  
**Effective Date:** 7/16/2013

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



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
ROSBY RESOURCE RECYCLING, INC.  
**Permit Number:** P0110665  
**Facility ID:** 1318118050  
**Effective Date:** 7/16/2013

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



**1. F002, Picking Line: Erin (2) Deck Shaker and Redox Separator.**

**Operations, Property and/or Equipment Description:**

Picking Line: Erin (2) Deck Shaker and Redox Separator.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., c(1), d)(1), and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11,30/2001.	Fugitive emissions of particulate matter of 10 microns or less (PM <sub>10</sub> ) shall not exceed 0.87 pound per hour (lb/hr) and 1.1 tons per year (tpy).  Fugitive particulate matter (PM) emissions shall not exceed 2.5 lbs/hr and 3.2 tpy.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B).  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006.	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V.	Fugitive emissions of particulate matter of 10 microns or less (PM <sub>10</sub> ) shall not exceed 1.1 tons per rolling, 12-month summation.  Fugitive particulate matter (PM) emissions shall not exceed 3.2 tons per rolling, 12-month summation.  See c)(1) below.
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	See b)(2c. – b)(2)g. below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> and PE emissions from this air contaminant source since the uncontrolled potential to emit for PM<sub>10</sub> and PE is each less than 10 tons/year.
- c. The material handling operation(s) that are covered by this permit and subject to the following requirements are listed below:

Material Handling Operation(s)  
Screening

Control Measure(s)  
dust suppression, as necessary



- d. The permittee shall employ reasonably available control measures for the material handling operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements and shall minimize free-fall distance of the processed material.
  - e. The permittee shall employ reasonably available control measures for the material handling operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to use a wet spray system as necessary to maintain compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
  - f. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) in b)(2)b, and b)(2)d, shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
  - g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).
- c) **Operational Restrictions**
- (1) The maximum annual operating hours for this emissions unit shall not exceed 2,548 hours, based on a rolling, 12-month summation of the operating hours.
  - (2) This facility shall not accept for disposal any regulated asbestos-containing material as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141 and OAC rule 3745-20, or any revisions to either rule. Regulated asbestos-containing material is defined to include:
    - a. friable asbestos material;
    - b. Category I non-friable asbestos-containing material that has become friable;
    - c. Category I non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading.
    - d. Category II non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain monthly records of the following information:



- a. the operating hours for each month; and
  - b. the rolling, 12-month summation of the operating hours.
- (2) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
All operations	Once during each day of operation

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. The inspections shall be performed during representative, normal operating conditions.

- (3) The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (Cleveland DAQ), modify the above-mentioned frequencies for performing the inspection if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain records of the following information for the material processing and handling operations:
- a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in “d” shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA’s eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for inspections in d)(2) and d)(4)above:
- a. each day during which an inspection of the material processing and handling operations was not performed by the required frequency; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.87 lb/hr and 1.1 tons/rolling 12-month summation, of fugitive particulate matter of 10 microns or less (PM<sub>10</sub>)

Applicable Compliance Method:

The PM<sub>10</sub> emission limitation was developed by multiplying the AP-42 emission factor of 0.0087 lb PM<sub>10</sub>/ton of material (Table 11.19.2-2) by the rated capacity of the grinder of 100 tons of material/hr.

The annual emission limitation was developed by multiplying the hourly emission limitation by 2,548 hour per year and a conversion factor of 1 ton per 2,000 pounds. Therefore, provided compliance is maintained with the hours/year limitation, compliance with the annual emission limitation shall also be demonstrated.



b. Emission Limitation:

2.5 lbs/hr and 3.2 tons per rolling 12-month summation, of fugitive particulate matter (PM).

Applicable Compliance Method:

The PM emission limitation was developed by multiplying the AP-42 emission factor of 0.025 lb PM/ton of material (Table 11.19.2-2) by the rated capacity of the grinder of 100 tons of material/hr.

The annual emission limitation was developed by multiplying the hourly emission limitation by 2,548 hour per year and a conversion factor of 1 ton per 2,000 pounds. Therefore, provided compliance is maintained with the hours/year limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by performing visible emissions observations in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) This emissions unit was installed July 2009.



**2. F004, Doppstadt 3060K Slow Speed Grinder**

**Operations, Property and/or Equipment Description:**

Doppstadt 3060K Slow Speed Grinder

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., c(1), d)(1), and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001.	Fugitive PM <sub>10</sub> emissions shall not exceed 2.16 lbs/hr and 2.8 tpy.  Fugitive PM emissions shall not exceed 3.60 lbs/hr and 4.6 tpy.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B).  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006.	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V.	Fugitive emissions of particulate matter of 10 microns or less (PM <sub>10</sub> ) shall not exceed 2.8 tons per rolling, 12-month summation.  Fugitive particulate matter (PM) emissions shall not exceed 4.6 tons per rolling, 12-month summation.  See c)(1) below.
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	See b)(2)c. – b)(2)g. below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> and PE emissions from this air contaminant source since the uncontrolled potential to emit for PM<sub>10</sub> and PE is each less than 10 tons/year.
- c. The material handling operation(s) that are covered by this permit and subject to the following requirements are listed below:

Material Handling Operation(s)

Control Measure(s)

Each load-in operation

minimize free-fall distance



Each material conveying operation      dust suppression, as necessary  
Each load-out operation                    minimize free-fall distance

The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with material handling for the purpose of ensuring compliance with the above-mentioned applicable requirements and shall minimize free-fall distance of the processed material.

- d. The permittee shall employ reasonably available control measures for the material handling operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to use a wet spray system as necessary to maintain compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) in b)(2)b and b)(2)c shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The maximum annual operating hours for this emission units shall not exceed 2,548-hours, based on a rolling, 12-month summation of the operating hours.
- (2) This facility shall not accept for disposal any regulated asbestos-containing material as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141 and OAC rule 3745-20, or any revisions to either rule. Regulated asbestos-containing material is defined to include:
  - a. friable asbestos material;
  - b. Category I non-friable asbestos-containing material that has become friable;
  - c. Category I non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading; and
  - d. Category II non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month; and
  - b. the rolling, 12-month summation of the operating hours.
- (2) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
All Operations	Once During Each Day of Operation

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. The inspections shall be performed during representative, normal operating conditions.

- (3) The permittee may, upon receipt of written approval from the Cleveland DAQ, modify the above-mentioned frequencies for performing the inspections if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain records of the following information for the material processing and handling operations:
  - a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in “d” shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA’s eBusiness Center: Air Services online web portal.



- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
      - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit.
      - b. the probable cause of each deviation (excursion);
      - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
      - d. the magnitude and duration of each deviation (excursion).
  - (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for inspections in terms d)(2) and d)(4) above:
    - a. each day during which an inspection of the material processing and handling operations was not performed by the required frequency; and
    - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
  
2.16 lbs/hr and 2.8 tons/rolling 12-month summation, of fugitive particulate matter of 10 microns or less (PM<sub>10</sub>).
    - Applicable Compliance Method:  
  
The PM<sub>10</sub> emission limitation was developed by multiplying the emission factor of 0.0144 lb PM<sub>10</sub>/ton of material (from General Permit for Tub Grinders, GP 11.1) by the rated capacity of the grinder of 150 tons of material/hr.



The annual emission limitation was developed by multiplying the hourly emission limitation by 2,548 hour per year and a conversion factor of 1 ton per 2,000 pounds. Therefore, provided compliance is maintained with the hours/year limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

3.6 lbs/hr and 4.6 tons per rolling, 12-month summation, of fugitive particulate matter (PM).

Applicable Compliance Method:

The PM emission limitation was developed by multiplying the emission factor of 0.024 lb PM/ton of material (from General Permit for Tub Grinders, GP 11.1) by the rated capacity of the grinder of 150 tons of material/hr.

The annual emission limitation was developed by multiplying the hourly emission limitation by 2,548 hours per year and a conversion factor of 1 ton per 2,000 pounds. Therefore, provided compliance is maintained with the hours/year limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by performing visible emissions observations in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) This emissions unit was installed June 2009.



**3. F005, Warrior Power Screener**

**Operations, Property and/or Equipment Description:**

Warrior Power Screener

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., c(1), d)(1), and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001.	Fugitive PM <sub>10</sub> emissions shall not exceed 1.74 lbs/hr and 2.2 tpy.  Fugitive PM emissions shall not exceed 5.0 lbs/hr and 6.4 tpy.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(b) and OAC rule 3745-17-08(B).  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006.	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V.	Fugitive emissions of particulate matter of 10 microns or less (PM <sub>10</sub> ) shall not exceed 2.2 tons per rolling, 12-month summation.  Fugitive particulate matter (PM) emissions shall not exceed 6.4 tons per rolling, 12-month summation.  See c)(1) below.
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	See b)(2)c. – b)(2)g. below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> and PE emissions from this air contaminant source since the uncontrolled potential to emit for PM<sub>10</sub> and PE is each less than 10 tons/year.
- c. The material handling operation(s) that are covered by this permit and subject to the following requirements are listed below:

<u>Material Handling Operation(s)</u>	<u>Control Measure(s)</u>
Each load-in operation	minimize free-fall distance



Each material conveying operation      dust suppression, as necessary  
Each load-out operation                    minimize free-fall distance

- d. The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with material handling for the purpose of ensuring compliance with the above-mentioned applicable requirements and shall minimize free-fall distance of the processed material.
- e. The permittee shall employ reasonably available control measures for the material handling operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to use a wet spray system as necessary to maintain compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) in b)(2)b. and b)(2)c. shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 2,548-hours, based on a rolling, 12-month summation of the operating hours.
- (2) This facility shall not accept any regulated asbestos-containing material as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141 and OAC rule 3745-20, or any revisions to either rule. Regulated asbestos-containing material is defined to include:
  - a. friable asbestos material;
  - b. Category I non-friable asbestos-containing material that will be or has become friable;
  - c. Category I non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading; and
  - d. Category II non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading.





- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
      - i. allexceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit.
      - b. the probable cause of each deviation (excursion);
      - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
      - d. the magnitude and duration of each deviation (excursion).
  - (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for inspections in d)(2) and d)(4)above:
    - a. each day during which an inspection of the material processing and handling operations was not performed by the required frequency; and
    - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

1.74 lbs/hr and 2.2 tons/rolling 12-month summation, of fugitive particulate matter of 10 microns or less (PM<sub>10</sub>).

Applicable Compliance Method:

The PM<sub>10</sub> emission limitation was developed by multiplying the AP-42 emission factor of 0.0087 lb PM<sub>10</sub>/ton of material (Table 11.19.2-2) by the rated capacity of the grinder of 200 tons of material/hr.



The annual emission limitation was developed by multiplying the hourly emission limitation by 2,548 hour per year and a conversion factor of 1 ton per 2,000 pounds. Therefore, provided compliance is maintained with the hours/year limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

5.0 lbs/hr and 6.4 tons per rolling, 12-month summation, of fugitive particulate matter (PM).

Applicable Compliance Method:

The PM emission limitation was developed by multiplying the AP-42 emission factor of 0.025 lb PM/ton of material (Table 11.19.2-2) by the rated capacity of the grinder of 200 tons of material/hr.

The annual emission limitation was developed by multiplying the hourly emission limitation by 2,548 hour per year and a conversion factor of 1 ton per 2,000 pounds. Therefore, provided compliance is maintained with the hours/year limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 10% opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by performing visible emissions observations in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) Emissions unit installed February 2010.



**4. F006, 726 Trommel Screen Doppstadt**

**Operations, Property and/or Equipment Description:**

726 Trommel Screen Doppstadt

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., c(1), d)(1), and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001.	Fugitive PM <sub>10</sub> emissions shall not exceed 0.57 lb/hr and 0.73 tpy.  Fugitive PM emissions shall not exceed 1.63 lbs/hr and 2.1 tpy.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B).  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006.	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V.	Fugitive emissions of particulate matter of 10 microns or less (PM <sub>10</sub> ) shall not exceed 0.73 tons per rolling, 12-month summation.  Fugitive particulate matter (PM) emissions shall not exceed 2.1 tons per rolling, 12-month summation.  See c)(1) below.
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	See b)(2)c. – b)(2)g. below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> and PE emissions from this air contaminant source since the uncontrolled potential to emit for PM<sub>10</sub> and PE is each less than 10 tons/year.
- c. The material handling operation(s) that are covered by this permit and subject to the following requirements are listed below:



<u>Material Handling Operation(s)</u>	<u>Control Measure(s)</u>
Each load-in operation	minimize free-fall distance
Each material conveying operation	dust suppression, as necessary
Each load-out operation	minimize free-fall distance

- d. The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with material handling for the purpose of ensuring compliance with the above-mentioned applicable requirements and shall minimize free-fall distance of the processed material.
- e. The permittee shall employ reasonably available control measures for the material handling operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee’s permit application, the permittee has committed to use a wet spray system as necessary to maintain compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) in b)(2)d and b)(2)e shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 2,548-hours, based on a rolling, 12-month summation of the operating hours.
- (1) This facility shall not accept any regulated asbestos-containing material as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141 and OAC rule 3745-20, or any revisions to either rule. Regulated asbestos-containing material is defined to include:
  - a. friable asbestos material;
  - b. Category I non-friable asbestos-containing material that will be or has become friable;
  - c. Category I non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading; and



- d. Category II non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month; and
  - b. the rolling, 12-month summation of the operating hours.
- (2) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
Trommel Screening	Once During Each Day of Operation

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. The inspections shall be performed during representative, normal operating conditions.

- (3) The permittee may, upon receipt of written approval from the Cleveland DAQ, modify the above-mentioned frequencies for performing the inspections if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain records of the following information for the material processing and handling operations:
  - a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in “d” shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA’s eBusiness Center: Air Services online web portal.



- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
      - i. allexceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit.
      - b. the probable cause of each deviation (excursion);
      - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
      - d. the magnitude and duration of each deviation (excursion).
  - (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for inspections in d)(2) and d)(4)above:
    - a. each day during which an inspection of the material processing and handling operations was not performed by the required frequency; and
    - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
0.57 lb/hr and 0.73 tons/rolling 12-month summation, of fugitive particulate matter of 10 microns or less (PM<sub>10</sub>).  
  
Applicable Compliance Method:  
  
The PM<sub>10</sub> emission limitation was developed by multiplying the AP-42 emission factor of 0.0087 lb PM<sub>10</sub>/ton of material (Table 11.19.2-2) by the rated capacity of the trommel screener of 65 tons of material/hr.



The annual emission limitation was developed by multiplying the hourly emission limitation by 2,548 hours per year and a conversion factor of 1 ton per 2,000 pounds. Therefore, provided compliance is maintained with the hours/year limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

1.63 lbs/hr and 2.1 tons per rolling, 12-month summation, of fugitive particulate matter (PM).

Applicable Compliance Method:

The PM emission limitation was developed by multiplying the AP-42 emission factor of 0.025 lb PM/ton of material (Table 11.19.2-2) by the rated capacity of the trommel screener of 65 tons of material/hr.

The annual emission limitation was developed by multiplying the hourly emission limitation by 2,548 hours per year and a conversion factor of 1 ton per 2,000 pounds. Therefore, provided compliance is maintained with the hours/year limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by performing visible emissions observations in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) Emissions unit installed April 2010.



**5. F007, 617 Trommel Screen Doppstadt**

**Operations, Property and/or Equipment Description:**

617 Trommel Screen Doppstadt

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., c(1), d)(1), and e)(3).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001.	Fugitive PM <sub>10</sub> emissions shall not exceed 0.44 lb/hr and 0.56 tpy.  Fugitive PM emissions shall not exceed 1.25 lbs/hr and 1.6 tpy.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(b) and OAC rule 3745-17-08(B).  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006.	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V.	Fugitive emissions of particulate matter of 10 microns or less (PM <sub>10</sub> ) shall not exceed 0.56 ton per rolling, 12-month summation.  Fugitive particulate matter (PM) emissions shall not exceed 1.6 tons per rolling, 12-month summation.  See c)(1) below.
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	See b)(2)c. – b)(2)g. below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> and PE emissions from this air contaminant source since the uncontrolled potential to emit for PM<sub>10</sub> and PE is each less than 10 tons/year.
- c. The material handling operation(s) that are covered by this permit and subject to the following requirements are listed below:



<u>Material Handling Operation(s)</u>	<u>Control Measure(s)</u>
Each load-in operation	minimize free-fall distance
Each material conveying operation	dust suppression, as necessary
Each load-out operation	minimize free-fall distance

- d. The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with material handling for the purpose of ensuring compliance with the above-mentioned applicable requirements and shall minimize free-fall distance of the processed material.
- e. The permittee shall employ reasonably available control measures for the material handling operations listed above, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee’s permit application, the permittee has committed to use a wet spray system as necessary to maintain compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) in b)(2)d and b)(2)e shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 2,548-hours, based on a rolling, 12-month summation of the operating hours.
- (2) This facility shall not accept any regulated asbestos-containing material as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141 and OAC rule 3745-20, or any revisions to either rule. Regulated asbestos-containing material is defined to include:
  - a. friable asbestos material;
  - b. Category I non-friable asbestos-containing material that will be or has become friable;
  - c. Category I non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading; and



- d. Category II non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month; and
  - b. the rolling, 12-month summation of the operating hours.
- (2) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
Trommel Screening	Once During Each Day of Operation

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. The inspections shall be performed during representative, normal operating conditions.

- (3) The permittee may, upon receipt of written approval from the Cleveland DAQ, modify the above-mentioned frequencies for performing the inspections if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain records of the following information for the material processing and handling operations:
  - a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in “d” shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA’s eBusiness Center: Air Services online web portal.



- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
      - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit.
    - b. the probable cause of each deviation (excursion);
    - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
    - d. the magnitude and duration of each deviation (excursion).
  - (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for inspections in d)(2) and d)(4) above:
    - a. each day during which an inspection of the material processing and handling operations was not performed by the required frequency; and
    - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

0.44 lb/hr and 0.56 ton/rolling 12-month summation, of fugitive particulate matter of 10 microns or less (PM<sub>10</sub>).

Applicable Compliance Method:

The PM<sub>10</sub> emission limitation was developed by multiplying the AP-42 emission factor of 0.0087 lb PM<sub>10</sub>/ton of material (Table 11.19.2-2) by the rated capacity of the Trommel screener of 50 tons of material/hr.

The annual emission limitation was developed by multiplying the hourly emission limitation by 2,548 hours per year and a conversion factor of 1 ton per 2,000



pounds. Therefore, provided compliance is maintained with the hours/year limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

1.25 lbs/hr and 1.6 tons per rolling, 12-month summation, of fugitive particulate matter (PM).

Applicable Compliance Method:

The PM emission limitation was developed by multiplying the AP-42 emission factor of 0.025 lb PM/ton of material (Table 11.19.2-2) by the rated capacity of the Trommel screener of 50 tons of material/hr.

The annual emission limitation was developed by multiplying the hourly emission limitation by 2,548 hours per year and a conversion factor of 1 ton per 2,000 pounds. Therefore, provided compliance is maintained with the hours/year limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by performing visible emissions observations in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) Emissions unit installed March 2010.



**6. F008, Storage Piles and Load-In and Load-Out**

**Operations, Property and/or Equipment Description:**

Storage Piles and Load-In and Load-Out

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001.	Fugitive PM emissions shall not exceed 9.62 tpy.  There shall be no visible emissions of fugitive dust except for one minute during any 60-minute period.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08(B).  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-17-07(B)(6) (Applies after SIP is approved)	There shall be no visible emissions of fugitive dust except for 13-minutes during any sixty minute period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	See b)(2)c. through b)(2)g. below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the uncontrolled potential to emit is less than 10 tons/year.
- c. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to maintain minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.  
  
The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.



- e. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to perform one or more of the following: (chemical stabilization, watering/sprinkling systems/hoses, covering the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	daily

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
all	daily

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
all	daily



- (4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
  - (5) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
  - (6) The permittee shall maintain records of the following information:
    - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
    - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
    - c. the dates the control measures were implemented; and
    - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).
  - (7) The information required in d)(6)d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for inspections in d)(6) above:
    - a. all days during which any visible emissions of fugitive dust was observed; and
    - b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

9.62 tpy of fugitive PM

Applicable Compliance Method:

Compliance with the fugitive PM limitation shall be determined by using the emission factor equations in Sections 13.2.4 and 13.2.5, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 1/95), for load-in operations, load-out operations, and wind erosion.

b. Emission Limitation:

There shall be no visible emission of fugitive dust except for a period of time not to exceed one minute in any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emission limitation for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

c. Emission Limitation:

There shall be no visible emissions of fugitive dust except for 13 minutes during any 60-minute period. This limit applies once the SIP is approved per b)(2)a. above.

Applicable Compliance Method:

Compliance with the visible emission limitation for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) Emissions unit installed June 2009.



**7. Emissions Unit Group -Diesel Generators: P001, P002**

EU ID	Operations, Property and/or Equipment Description
P001	(1) 243 HP Diesel Generator for Picking Line
P002	(2) 243 HP Diesel Generator for Picking Line

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)h., c)(3), d)(3), e)(4)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001.	Particulate emissions (PE) shall not exceed 0.68 ton per rolling 12-month period for each engine.  Nitrogen oxide (NO <sub>x</sub> ) emissions shall not exceed 9.6 tons per rolling 12-month period for each engine.  Carbon monoxide (CO) emissions shall not exceed 2.1 ton per rolling 12-month period for each engine.  Organic compound (OC) emissions shall not exceed 0.78 ton per rolling 12-month period for each engine.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.64 ton per rolling 12-month period.  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006.	See b)(2)b. below.
c.	40 CFR Part 60, Subpart IIII 40 CFR 60.4204(b) 40 CFR 60.4201(a) Table 1 to 40 CFR 89.112, Tier 3	The exhaust emissions from this engine shall not exceed:  0.20 gram PM/kW-hr 4.0 grams NO <sub>x</sub> + NMHC/kW-hr 3.5 grams CO/kW-hr  See b)(2)c. through b.)2)e. below.
d.	40 CFR 60.4207(b) 40 CFR 80.510(b)	The sulfur content of the diesel fuel burned in each emissions unit shall not exceed 15 ppm or 0.0015% sulfur by weight.  See b)(2)e., c(2), d(1), and e(2) below.
e.	40 CFR 89.113 (certified by manufacturer)	20% opacity during the acceleration mode.  15% opacity during the lugging mode.  50% opacity during the peaks in either the acceleration or lugging modes.
f.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed twenty (20) percent opacity, as a six-minute average, except as specified by rule.
g.	OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is less stringent than the emission limitation established for PE pursuant to 40 CFR Part 60, Subpart IIII.
h.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V.	Particulate emissions (PE) shall not exceed 0.68 ton per rolling 12-month period for each engine.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 3.3 tons per rolling 12-month period for each engine.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.68 ton per rolling 12-month period for each engine.</p> <p>Organic compound (OC) emissions shall not exceed 0.78 ton per rolling 12-month period for each engine.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.64 ton per rolling 12-month period.</p> <p>See c)(2) and c)(3) below.</p>
i.	40 CFR 63 Subpart ZZZZ 40 CFR 63.6590(c)	A new area source operating in compliance with Part 60 Subpart IIII is the demonstration of compliance for 40 CFR 63 Subpart ZZZZ.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC Rule 3745-31-05 was revised to conform with Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC Rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once the U.S. EPA approves the December 1, 2006 revision of OAC Rule 3745-31-05, then these emissions limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan (SIP).  
  
 The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM, NO<sub>x</sub>, CO, VOC and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for PM, NO<sub>x</sub>, CO, VOC and SO<sub>2</sub> is less than 10 tons/year.



- c. The stationary compression ignition (CI) internal combustion engine (ICE) is subject to and shall be operated in compliance with the requirements of 40 CFR Part 60, Subpart IIII, the standards of performance for stationary CI ICE.
- d. The stationary CI ICE has been or shall be purchased certified by the manufacturer, to emission standards as stringent as those identified in 40 CFR 60.4201(a) and found in Tier 3 of 40 CFR 89.112, Table 1, for engines greater than or equal to 175 horsepower (130 kilowatt) and less than or equal to 750 horsepower (560 kilowatt), and to the opacity standards found in 40 CFR 89.113.
- e. The quality of the diesel fuel burned in this emissions unit shall meet the following specifications on an "as received" basis:
  - i. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.0015 pound sulfur dioxide/MMBtu actual heat input; and 15 ppm sulfur or 0.0015% sulfur by weight;
  - ii. a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent; and
  - iii. a heating value greater than 135,000 Btu/gallon.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

c) Operational Restrictions

- (1) The stationary CI ICE and any control device shall be installed, operated, and maintained according to the manufacturer's emission-related written instructions and the permittee shall only change those emission-related settings that are allowed by the manufacturer. The CI ICE must also be installed and operated to meet the applicable requirements from 40 CFR Part 89, Control of Emissions from New and In-use Non-road CI ICE; and Part 1068, the General Compliance Provisions for Engine Programs. The permittee shall operate and maintain the stationary CI ICE to achieve the emissions standards established in 40 CFR 60.4204 over the entire life of the engine(s).
- (2) Diesel fuel burned in the CI, ICE shall not exceed the limit for sulfur as specified by 40 CFR 80.510(b), i.e., the maximum sulfur content of diesel fuel shall not exceed 15 ppm or 0.0015% sulfur by weight.
- (3) The maximum annual operating hours for this emissions unit shall not exceed 2,548 hours per rolling, 12-month period for each engine.
- (4) If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the permittee when the high backpressure limit of the engine is approached.



d) **Monitoring and/or Recordkeeping Requirements**

- (1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of the diesel oil received and the oil supplier's (or permittee's) analyses for sulfur content, in parts per million (40 CFR 80.510) or percent by weight. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR 80.580, using the appropriate ASTM methods. These records shall be retained for a minimum of 5 years and shall be available for inspection by the Director or his/her representative.
- (2) The permittee shall maintain the manufacturer's certification, to the applicable Tier 3 emission standards in Table 1 of 40 CFR 89.112, on site or at a central location for all facility ICE and it shall be made available for review upon request. If the manufacturer's certification is not kept on site, the permittee shall maintain a log for the location of each ICE and it shall identify the agency-assigned emissions unit number, the manufacturer's identification number, and the identification number of the certificate. The manufacturer's operations manual and any written instructions or procedures developed by the permittee and approved by the manufacturer shall be maintained at the same location as the ICE.
- (3) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month; and
  - b. the rolling, 12-month summation of the operating hours.
- (4) If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the permittee shall keep records of the date, time, and any corrective action(s) taken in response to the notification from the backpressure monitor, that the high backpressure limit of the engine has been approached or exceeded.

e) **Reporting Requirements**

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report any period of time (date and number of hours) that the quality of oil burned in this emissions unit did not meet the requirements established in 40 CFR 80.510(b), based upon the required fuel records; and the amount of non-compliant fuel burned on each such occasion.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:



- a. all deviations (excursions) of the following operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
    - i. allexceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).
- (5) If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the permittee shall include in the PER any records of the date, time, and any corrective action(s) taken in response to the notification from the monitor that the backpressure has been approached or exceeded.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Opacity Limitation:  
20% opacity during the acceleration mode  
15% opacity during the lugging mode  
50% opacity during the peaks in either the acceleration or lugging modes  
Applicable Compliance Method:  
The ICE shall be purchased certified to the opacity standards of 40 CFR 89.113.
    - b. Opacity Limitation:  
Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20 %opacity, as a six-minute average, except as specified by rule.  
Applicable Compliance Method:  
If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.



c. Emission Limitations:

0.20 gram PM/kW-hr

0.68 ton PE/rolling 12-month period

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification and by maintaining the engine according to the manufacturer's specifications. The g/kW-hr limit is the emission limitation from Table 1 of 40 CFR 89.112, the Tier 3 exhaust emission standards for diesel engines between 175 and 750 horsepower (130 and 560 kilowatts).

Compliance with the ton per rolling 12-month PE emissions limitation was determined by multiplying the maximum hourly emission rate (determined by using emission factor from AP-42 Table 3.3-1) by 2,548 hours per year and dividing by 2,000 lbs/ton. Therefore, provided compliance is maintained with the short term emission rate, compliance will also be determined for the ton/year limitation.

If required, the permittee shall demonstrate compliance with the emission limitations through performance tests conducted in accordance with the provisions in f)(1)i below.

d. Emission Limitations:

4.0 grams NO<sub>x</sub> + NMHC/kW-hr

9.6 tons NO<sub>x</sub>/rolling 12-month period

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification and by maintaining the engine according to the manufacturer's specifications. The g/kW-hr limit is the emission limitation from Table 1 of 40 CFR 89.112, the Tier 3 exhaust emission standards for diesel engines between 175 and 750 horsepower (130 and 560 kilowatts).

For the purpose of reporting emissions, where the limit is for NO<sub>x</sub> + NMHC, the NO<sub>x</sub> and VOC limits shall be calculated using a ratio of 74.6% NO<sub>x</sub> to 25.4% VOC.\*

$4.0 \text{ g NO}_x + \text{NMHC/kW-hr} \times 74.6\% \text{ NO}_x^* = 3.0 \text{ grams NO}_x/\text{kW-hr}$

Compliance with the ton per rolling, 12-month NO<sub>x</sub> emissions limitation shall be determined by multiplying the maximum hourly emission rate (determined by using emission factor from AP-42 Table 3.3-1) by 2,548 hours per year and dividing by 2,000 lbs/ton. Therefore, provided compliance is maintained with the



short term emission rate and the annual hours/year restriction, compliance will also be determined for the ton/year limitation.

If required, the permittee shall demonstrate compliance with the emission limitations through performance tests conducted in accordance with the provisions in f)(1)i. below.

e. Emission Limitations:

3.5 grams CO/kW-hr

2.1 tons CO/rolling 12-month period

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification and by maintaining the engine according to the manufacturer's specifications. The g/kW-hr limit is the emission limitation from Table 1 of 40 CFR 89.112, the Tier 3 exhaust emission standards for diesel engines between 175 and 750 horsepower (130 and 560 kilowatts).

Compliance with the ton per rolling 12-month CO emissions limitation shall be determined by multiplying the maximum hourly emission rate (determined by using emission factor from AP-42 Table 3.3-1) by 2,548 hours per year and dividing by 2,000 lbs/ton. Therefore, provided compliance is maintained with the short term emission rate and the annual hours/year restriction, compliance will also be determined for the ton/year limitation.

If required, the permittee shall demonstrate compliance with the emission limitations through performance tests conducted in accordance with the provisions in f)(1)i. below.

f. Emission Limitations:

4.0 grams NO<sub>x</sub> + NMHC/kW-hr

0.78 ton OC/rolling 12-month period

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification and by maintaining the engine according to the manufacturer's specifications. The g/kW-hr limit is the emission limitation from Table 1 of 40 CFR 89.112, the Tier 3 exhaust emission standards for diesel engines between 175 and 750 horsepower (130 and 560 kilowatts).



For the purpose of reporting emissions, where the limit is for NO<sub>x</sub> + NMHC, the NO<sub>x</sub> and VOC limits shall be calculated using a ratio of 74.6% NO<sub>x</sub> to 25.4% VOC.\*

$$4.0 \text{ g NO}_x + \text{NMHC/kW-hr} \times 25.4\% \text{ NMHC}^* = 1.0 \text{ gram VOC/kW-hr}$$

Compliance with the ton per rolling 12-month OC emissions limitation shall be determined by multiplying the maximum hourly emission rate (determined by using emission factor from AP-42 Table 3.3-1) by 2,548 hours per year and dividing by 2,000 lbs/ton. Therefore, provided compliance is maintained with the short term emission rate and the annual hours/year restriction, compliance will also be determined for the ton/year limitation.

If required, the permittee shall demonstrate compliance with the emission limitations through performance tests conducted in accordance with the provisions in f)(1)i. below.

\*This ratio is based upon the linear relationship of NO<sub>x</sub> to NMHC from Table 1 of Subpart IIII, Table 1 from 40 CFR 89.112, to Tables 4, 5, and 6 from 1039.102.

g. Sulfur Content Limitations for Diesel Fuel:

Sulfur content 15 ppm or  $\leq$  0.0015% by weight sulfur

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements for the sulfur content of each shipment of diesel oil received. If meeting the standards in 40 CFR 80.510(b), this calculates to approximately 0.0015lb SO<sub>2</sub>/MMBtu.

h. Emission Limitations:

0.64 ton of SO<sub>2</sub>/rolling 12-month period

Applicable Compliance Method:

Compliance with the ton per rolling 12-month SO<sub>2</sub> emissions limitation shall be determined by multiplying the maximum hourly emission rate (determined by using emission factor from AP-42 Table 3.3-1) by 2,548 hours per year and dividing by 2,000 lbs/ton. Therefore, provided compliance is maintained with the short term emission rate and the annual hours/year restriction, compliance will also be determined for the ton/year limitation.

i. If it is determined by the Ohio EPA that a compliance demonstration is required through performance testing, it shall be conducted using one of the following test methods or procedures:

i. in accordance with 40 CFR 60.4212, conduct the exhaust emissions testing using the in-use testing procedures found in 40 CFR Part 1039,



Subpart F, measuring the emissions of the regulated pollutants as specified in 40 CFR 1065; or

- ii. in accordance with 40 CFR 60.4213, conduct exhaust emissions testing using the test methods identified in Table 7 to Subpart IIII of Part 60.

If demonstrating compliance through the in-use testing procedures in 40 CFR part 1039, Subpart F, exhaust emissions from the stationary CI ICE shall not exceed the "not to exceed" (NTE) numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112, determined from the following equation:

$$\text{NTE requirement for each pollutant} = 1.25 \times \text{STD}$$

Where:

STD = the standard specified for the pollutant in 40 CFR 89.112.

- g) Miscellaneous Requirements
  - (1) Emissions unit installed July 2009.