Facility ID: 0660950028 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0660950028 Emissions Unit ID: F002 Issuance type: Final State Permit To Operate

Go to the top of this document

Part II - Special Terms and Conditions

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.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Piles including load in, load out and wind erosion (Portable with Screen Plant #12)	OAC rule 3745-31-05(A)(3) (PTI # 06-08184; issued 12/12/06)	0.62 tons/year of fugitive PE No visible PE except for one minute during any 60-minute period Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See Sections A.2.a through A.2.e)
	OAC rule 3745-17-07(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

   (a) The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

   ALL
   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 control fugitive emissions by utilizing water sprinkling systems at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
   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.
   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 watering storage piles to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
   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.
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).

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping 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:
storage pile identification minimum load-in inspection frequency
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:

storage pile identification minimum load-out inspection frequency
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:
storage pile identification minimum wind erosion inspection frequency
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).

The information required in 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.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
Emission Limitation:
No visible emissions except for 1 minute in any 60 minute period.

Compliance Method:
If required, compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as s et forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").
Emission Limitation:
0.62 tons/year PE

Compliance Method:
Compliance shall be determined based on the emission factor calculation for drop operations associated with storage piles in AP-42 section 13.2.4 (01/95).

Initial compliance has been determined using inputs representing current conditions as follows:

EF = k (0.0032) [(U/5)1.3/ (M/2)1.4)]

Where:

EF = emission factor expressed in pounds per ton (lbs/ton)
k = particle size multiplier for TSP (dimensionless) = 0.74
U = mean wind speed expressed in miles per hour (MPH) = 9.1
M= material moisture content (%) = 4.0

Therefore, EF = 0.002 lbs/ton

maximum annual load-in throughput = 3,888,000 tons/year
maximum annual load-out throughput = 3,888,000 tons/year

[(3,888,000 tons/year) (0.002 lb PE/ton) + (3,888,000 tons/year)(0.002 lb PE/ton)]/ 2000lb/ton
= 7.78 TPY of uncontrolled PE

Assume 95% control for watering (engineering estimate of permittee)
(7.78 TPY) (.05) = 0.39 TPY of controlled PE and;
the emission factor calculation for wind erosion from storage piles found in USEPA's Control of Open Fugitive Dust Sources (9/88). Initial compliance has been determined using inputs representing current conditions as follows:

EF = (1.7) (s/1.5) ((365-p)/365)) (f/15)

Where:

E= emission factor in pounds (lbs)/day/acre
s = silt content of road surface material (%) = 6.4%
p= number of rain days per year >0.01 in. = 145
f = percentage of time that wind speed exceeds 12 mph (%) = 30
A= total surface area of storage piles (acres) = 2.35

Therefore, EF= 10.61 lbs/day/acre

[(10.61 lbs/day/acre)(365 days/yr)(2.35 acres)]/2000 lbs/ton = 4.55 TPY uncontrolled PE

Assume 95% control for watering (engineering estimate of permittee)
(4.55 TPY) (0.05) = 0.23 TPY controlled PE

TOTAL EMISSION SUMMARY
Load-out = 0.39 TPY
Wind erosion = 0.23 TPY

Total emissions = 0.62 TPY

F. **Miscellaneous Requirements**

1. At the discretion and following the approval of the director, the permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI) providing the appropriate exemption requirements have been met. The director may issue a "Notice of Site Approval" for either of the following situations: the permittee notifies the director a minimum of 30 days prior to relocating pursuant to OAC rule 3745-31-03(A)(1)(p)(i), or the permittee identifies pre-disclosed location(s) that meet the criteria found in OAC rule 3745-31-05(E).

2. Pursuant to OAC rules 3745-31-03(A)(1)(p)(i), 3745-31-03(A)(1)(p)(ii), and 3745-31-05(E), the following criteria must be met for all portable facilities seeking approval for relocation:

   a. the portable source must possess an issued permit to install (PTI) and demonstrate continuing compliance with any applicable best available technology determination and state and/or federal air pollution rule or law; and,

   b. the portable source is operating pursuant to a currently effective PTI and/or any applicable permit to operate (PTO) and demonstrates continuing compliance with the requirements of the permit .

3. In order to relocate a portable source in accordance with OAC rule 3745-31-03(A)(1)(p)(i) (i.e. the 30-day option), the following additional criteria must be met:

   a. the permittee has provided proper notice of intent to relocate the portable source to the permitting District Office/ Local air agency a minimum of thirty days prior to the scheduled relocation;

   b. the permitting District Office/Local air agency and the District Office/Local air agency having jurisdiction over the new site have determined that the emissions would not cause a nuisance in violation of OAC rule 3745-15-07, and that the relocation of the portable source would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site; and

   c. the director has issued a "Notice of Site Approval", stating that the proposed site is acceptable under rule 3745-15-07 of the Administrative Code and that the relocation will not result in the installation or modification of a major stationary source.

   Using the 30-day option, the portable source may only be relocated upon receipt of the "Notice of Site Approval".

4. In order to relocate a portable source in accordance with OAC rules 3745-31-03(A)(1)(p)(ii) and 3745-31-05(E) (i.e. the 15-day option) , the following additional criteria must be met:

   a. the portable source owner has identified the proposed site(s) to the permitting District Office/Local air agency;

   b. the owner of the proposed site(s) (if not the permittee) has provided the portable source owner with approval,

or an equivalent declaration, that it is acceptable to move the portable source to the proposed site(s);

c. the permitting District Office/Local air agency and the District Office/Local air agency having jurisdiction over the new site have determined that the portable source will have an acceptable environmental impact at the proposed site(s);

d. a public notice, consistent with OAC rule 3745-47, has been published in the county where the proposed site (s) is/are located; and

e. the permittee has provided the Ohio EPA with a minimum of a 15-day written notice of the relocation.

Using the 15-day option, the portable source may only be relocated upon receipt of the"Notice of Site Approval", and following submittal of the 15-day notice of the relocation. Any site approvals issued pursuant to OAC rule 3745-05(E) shall be valid for no longer than 3 years and are subject to renewal. Also, pursuant to OAC rule 3745-31-05(F), the director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

5. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

6. When a portable source is co-located at a stationary source, or is co-located with multiple portable sources, potential emissions from the portable source may be required to be combined for facility potential to emit calculations for Title V and PSD applicability. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01 (LLL) and (JJJ), the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.