Facility ID: 0671010152 Issuance type: Final State Permit To Operate

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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: 0671010152 Emissions Unit ID: F003 Issuance type: Final State Permit To Operate

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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
F003 - Unpaved roadways and parking areas	OAC rule 3745-31-05(A)(3)	Total particulate emissions (PE) shall not exceed 28.3 tons per year. No visible particulate emissions except for 3 minutes during any 60-minute period. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.g)

2. **Additional Terms and Conditions**

   (a) The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

   unpaved roadways:

   Service Road
   Haul Road

   unpaved parking areas:

   Parking Area
   The permittee shall employ best available control measures on all unpaved roadways and parking areas 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 treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals to ensure compliance. at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
   The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved roadway or parking area 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 any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
   Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using water. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.
   The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
   Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
   Implementation of the above-mentioned control measures in accordance with the terms and conditions

of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

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 the unpaved roadways and parking areas in accordance with the following frequencies:

   unpaved roadways minimum inspection frequency

   all daily

   unpaved parking areas minimum inspection frequency

   all daily

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area 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. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such events have ended, except if the next required inspection is within one week.

3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:
   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;
   the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
   the dates the control measures were implemented; and
   on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

   The information required in 4.d. 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 deviation reports that identify any of the following occurrences:
   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
   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. Emission Limitation: No visible particulate emissions except for 3 minutes during any 60-minute period

   Compliance Method: Compliance with the emission limitation for the unpaved roadways and parking areas 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," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

2. Emission Limitation: Particulate emissions shall not exceed 28.3 tons per year.

   Compliance Method: The emission factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.2 (September, 1998) shall be utilized to determine compliance. Initial compliance has been determined using inputs representing current conditions as follows:

   E = k(s/12)*a(W/3)*b / (M/0.2)*c

   Where

   E = size-specific emission factor (lb/VMT)
   s = silt content of road surface material (%) = 10.0 %
   W = mean vehicle weight (tons) = 30
   M = surface material moisture content (%) = 4.0%
   a = 0.8 (dimension less constant)
   b = 0.5 (dimension less constant)
   c = 0.4 (dimension less constant)
   k = 10 (dimension less constant) particle size multiplier

   Therefore, E = 3.06 lbs particulate/VMT

   Maximum travel = 92,600 VMT/year

   (92,600 VMT/yr)(3.06 lbs/VMT) = 277,800 lbs of particulate/year

(536,249.90 lbs/year)(1 ton/2000 lbs) = 141.5 tons of particulate uncontrolled/year

Assume 80% control for roadway watering
(141.5 tons/year) (.20) = 28 tons of particulate controlled/year

F. **Miscellaneous Requirements**

1. None