

Facility ID: 0679000270 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: 0679000270 Emissions Unit ID: F002 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Aggregate storage piles	OAC rule 3745-31-05(A)(3) (PTI 06-07733)	Particulate emissions (PE) shall not exceed 0.5 tpy from plant load-in and load-out of storage piles.
load-in and load-out of storage piles (see section A.2.a for identification of storage piles)		There shall be no visible particulate emissions except for 1 minute during any 60-minute period.
wind erosion from storage piles (see section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b, A.2.c and A.2.f).
		PE shall not exceed 0.2 tpy from wind erosion of storage piles.
		There shall be no visible particulate emissions except for 1 minute during any 60-minute period.
		The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.d through A.2.f).

**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:

one sand pile;  
two aggregate piles; and  
one recycled asphalt pavement (RAP) pile.

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 permit application, the permittee has committed to water, as needed, 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 permittee's permit application, the permittee has committed to water, as needed, 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.

**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

one sand pile daily - when operating  
two aggregate piles daily - when operating  
one recycled asphalt pavement (RAP) pile daily - when operating

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

one sand pile daily - when operating  
two aggregate piles daily - when operating  
one recycled asphalt pavement (RAP) pile daily - when operating

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

one sand pile daily - when operating  
two aggregate piles daily - when operating  
one recycled asphalt pavement (RAP) pile daily - when operating

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 section C.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 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 these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

PE shall not exceed 0.5 tpy from plant load-in and load-out of storage piles.

## Applicable 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:

$$E = k \times (0.0032) \times [(U/5)^{1.3} / (M/2)^{1.4}]$$

where:

E = emission factor expressed in pounds (lbs) / ton;  
 k = particle size multiplier for TSP (dimensionless) = 0.74;  
 U = mean wind speed expressed in miles per hour (MPH) = 9.9; and  
 M = material moisture content (%) = 5 (sand), 3 (agg. #1), 2 (agg. #2), 3 (RAP).

Therefore, E (lb PE/ton) = 0.0016 (sand), 0.0033 (agg. #1), 0.0058 (agg. #2), 0.0033 (RAP).

maximum annual load-in throughput (tons/year) = 143,000 (sand), 238,332 (agg. #1), 95,332 (agg. #2), 47,666 (RAP)

maximum annual load-out throughput (tons/year) = 143,000 (sand), 238,332 (agg. #1), 95,332 (agg. #2), 47,666 (RAP)

$[(143,000 \text{ tons/yr})(0.0016 \text{ lb PE/ton}) + (143,000 \text{ tons/yr})(0.0016 \text{ lb PE/ton}) + (238,332 \text{ tons/yr})(0.0033 \text{ lb PE/ton}) + (238,332 \text{ tons/yr})(0.0033 \text{ lb PE/ton}) + (95,332 \text{ tons/yr})(0.0058 \text{ lb PE/ton}) + (95,332 \text{ tons/yr})(0.0058 \text{ lb PE/ton}) + (47,666 \text{ tons/yr})(0.0033 \text{ lb PE/ton}) + (47,666 \text{ tons/yr})(0.0033 \text{ lb PE/ton})] / 2000 \text{ lb/ton} = 1.726 \text{ tpy of uncontrolled PE}$

Assume 75% control for watering (RACM, Table 2.1.1-8):

$$(1.726 \text{ tpy})(0.25) = 0.432 \text{ tpy of controlled PE}$$

Emission Limitation:

PE shall not exceed 0.2 tpy from wind erosion of storage piles.

## Applicable Compliance Method:

Compliance shall be determined based on the emission factor calculation for wind erosion from storage piles in BACM, Equation 2-12 (September, 1992). Initial compliance has been determined using inputs representing current conditions as follows:

$$E = 1.7 \times (s/1.5) \times [(365-p)/235] \times (f/15)$$

where:

E = emission factor expressed in pounds (lbs) /day/acre;  
 s = silt content of stored material (%) = 1.0 %;  
 p = number of rain days per year > 0.01 in = 140;  
 f = percentage of time wind speed exceeds 12 mph (%) = 30; and  
 A = total surface area of storage piles (acres) = 1.5.

Therefore, E = 2.17 lbs of PE/day/acre.

$(2.17 \text{ lbs/day/acre})(365 \text{ days/yr})(1.5 \text{ acres}) / 2000 \text{ lbs/ton} = 0.594 \text{ tpy of uncontrolled PE}$

Assume 80% control for watering (RACM, Table 2.1.1-8):

$$(0.594 \text{ tpy})(0.20) = 0.119 \text{ tpy of controlled PE}$$

Emission Limitation:

There shall be no visible particulate emissions except for 1 minute during any 60-minute period.

## Applicable Compliance Method:

If required, compliance 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, 2002.

## F. Miscellaneous Requirements

1. None