Facility ID: 0679000270 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

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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
Plant roadways and parking areas	OAC rule 3745-31-05(A)(3) (PTI 06-07733)	Particulate emissions (PE) shall not exceed 6.5 tons per year (tpy).
paved roadways and parking areas (see section A.2.a)	OAC rule 3745-31-05(A)(3)	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.c, and A.2.e through A.2.i).
unpaved roadways and parking areas (see section A.2.b)	OAC rule 3745-31-05(A)(3)	There shall be no visible particulate emissions except for 3 minutes 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.i).

2. **Additional Terms and Conditions**

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

   Paved Roadways:

   driveway from public road
   The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

   Unpaved Roadways:

   areas around asphalt plant

   Unpaved Parking Areas:

   all
   The permittee shall employ best available control measures on all paved 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 paved roadways and parking areas by watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
   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 or virgin oil 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 a paved or 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 with the control measure(s) specified above for paved surfaces. 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 the visible emission limitation for paved roadways and parking areas.
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 from activities at the facility, 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 roadways and parking areas in accordance with the following frequencies:

   paved roadways and parking areas minimum inspection frequency

   driveway from public road daily - when operating

   unpaved roadways and parking areas minimum inspection frequency

   all daily - when operating

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 event(s) has (have) ended, except if the next required inspection is within one week.

3. 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 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 section C.3.d shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, 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 Limitations:

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

   There shall be no visible particulate emissions except for 3 minutes during any 60-minute period for unpaved roads.

   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.
Emission Limitation:

Particulate emissions shall not exceed 6.5 tpy.

Applicable Compliance Method:

FOR UNPAVED SURFACES:

Compliance shall be determined based on the emission factor calculation for unpaved roadways and parking areas in AP-42, section 13.2.2 (12/03). Initial compliance has been determined using inputs representing current conditions as follows:

E = k x (s/12)^a x (W/3)^b x [(365-p)/365)]

where:

E = size-specific emission factor (lb/VMT);
s = silt content of road surface material (%) = 5.0 %;
W = mean vehicle weight (tons) = 31;
a = constant (dimensionless) = 0.7;
b = constant (dimensionless) = 0.45;
k = particle size multiplier (dimensionless) = 4.9; and
p = number of rain days per year >0.01 in = 140.

Therefore, E = 4.68 lbs of PE / VMT.

Maximum travel = 3,350 VMT/year.

(3,350 VMT/yr)(4.68 lbs/VMT)(1 ton/2000 lbs) = 7.84 tpy of uncontrolled PE

Assume 75% control for roadway watering and gravel application:

(7.84 tpy)(0.25) = 1.96 tpy of controlled PE
FOR PAVED SURFACES:

Compliance shall be determined based on the emissions factor calculation for unpaved roadways and parking areas in AP-42, section 13.2.1 (12/03). Initial compliance has been determined using inputs representing current conditions as follows:

E = [k x (sL/2)^0.65 x (W/3)^1.5] -C

where:

E = size-specific emission factor (lb/VMT);
k = particle size multiplier (dimensionless) = 0.082;
sL = road surface silt loading (g/m2) = 49.9;
W = mean vehicle weight (tons) = 35; and
C = constant = 0.00047.

Therefore, E = 26.44 lbs of PE / VMT.

Maximum travel = 1350 VMT/year.

(1350 VMT/yr)(26.44 lbs/VMT)(1 ton/2000 lbs) = 17.85 tpy of uncontrolled PE

Assume 75% control for roadway watering:

(17.85 tpy)(0.25) = 4.46 tpy of controlled PE

TOTAL EMISSIONS:

Unpaved: 1.96 tpy + Paved: 4.46 tpy = Total: 6.42 tpy

F. **Miscellaneous Requirements**

1. None