



2/4/2014

Certified Mail

Mr. Robert Boehk
 Erie Materials, Inc.
 PO Box 2308
 Sandusky, OH 44870

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
 Facility ID: 0322022008
 Permit Number: P0115490
 Permit Type: Initial Installation
 County: Erie

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.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 by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 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: Ohio EPA-NWDO



Response to Comments

Facility ID:	0322022008
Facility Name:	Erie Materials, Inc.
Facility Description:	Portable Grinder (600 hp)
Facility Address:	4507 Tiffin Avenue Sandusky, OH 44871 Erie County
Permit:	P0115490, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Sandusky Register on 11/01/2013. The comment period ended on 12/01/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Federally Enforceable Emissions Limitations (Item #1, Item #8, Item #9)

- a. Comment: The only pollutant that the company requested federally enforceable limits for is NOx because the unit is co-located at a facility where the total combined NOx emissions could exceed Title V permitting threshold. Emissions limitations for all other pollutants and the associated terms and conditions should not be included under OAC rule 3745-31-05(D).
- b. Response: After a discussion with Dine Comply Incorporated on December 5, 2013, it was determined that all of the pollutants would remain under OAC rule 3745-31-05(D) since they would be restricted by the 2,000 hours per year operational restriction and each pollutant's potential to emit would therefore be clearly defined and federally enforceable.

2. Topic: Numerous Emissions Limitation for Same Pollutant (Item #2, Item #4)

- a. Comment: Clarify the basis for the applicability of both numerical particulate limits and opacity limits for the fugitive emissions from the grinder operations in b)(1)a.
- b. Response: Ohio EPA established an updated BAT guidance document on August 30, 2013. This guidance applies to BAT determinations made for new or modified sources for which the permit was issued on or after October 1, 2013. However, since this emission unit was installed in 2009, in accordance with the current guidance document, the BAT guidance in effect in 2009 has been used in this permit. BAT guidance in 2009 would include citing both a short term and



annual limit for each criteria pollutant and would include an annual fugitive PM10 and opacity limitation for the grinder operations.

- c. Comment: Section b)(1)d includes applicable emissions limitations for PM, NO_x + NMHC and CO based on the applicable NSPS Subpart IIII requirements. Why has Ohio EPA established these limits in addition to hourly, annual, and opacity emissions limits or PM, NO_x, VOC, and CO. NSPS requirements apply to the manufacturer of the equipment and since this is a certified engine, the applicability of the emissions limits in this permit seems unnecessary.
- d. Response: The Vendor Conformance Certificates/Product Information provided by the permittee for PM, NO_x, VOC, and CO was used to establish emission limitations under OAC rule 3745-31-05(D). These emission limitations are more stringent than this applicable federal rule; therefore, an additional term and condition will be added including that the emission limitations established pursuant to OAC rule 3745-31-05(D) are more stringent than the emission limitations established pursuant to 40 CFR, Part 60, Subpart IIII.

3. Topic: SO₂ Emissions Calculations (Item #3)

- a. Comment: Clarify the emission calculation for SO₂ as 0.01 lb SO₂/hour and tons/year listed in b)(1)a.
- b. Response: Because this engine is subject to 40 CFR Part 60, Subpart IIII, emissions for SO₂ were calculated using the emission standard of 0.0015 lb SO₂/MMBtu from 40 CFR 80.510(b). The hourly emission limit was calculated using this standard multiplied by 0.007 MMBtu/hp-hr (the conversion factor of 7,000 btu/hp-hr from AP-42, 3.3, Table 3.3-1 divided by 1,000,000 to convert to MMBtu/hp-hr) and then multiplied by 600 hp which equates to 0.0063 lb SO₂/hr. The Ohio EPA rounded up to 0.01 lb SO₂/hr. As the company has requested, the emission limit will for SO₂ will be changed to 0.0063 lb SO₂/hr in the permit.

4. Topic: Diesel Fuel Requirements (Item #5)

- a. Comment: The company is opposed to this applicable rule, emission limitation, and corresponding record keeping and reporting requirements listed in b)(1)e, b)(2)l, c)(4), d)(7), e)(4), and f)(1)h. The federal regulation is applicable to the producers of the fuels sold on the market making it impossible for the company to purchase fuel that does not meet the standard. The company requests terms associated with diesel fuel requirements be removed.
- b. Response: In b)(1)e., 40 CFR 60.4207(b) and 40 CFR 80.510(b) are listed as applicable rules. 40 CFR 60.4207 lists fuel requirements for owners and operators. Specifically, 40 CFR 60.4207(b) states "Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted." As such, these two rules are applicable and are listed in the permit. Terms and conditions b)(2)i., c)(4), d)(7), e)(4) and f)(1)h. represent the appropriate emission limitations, fuel requirements, operational restrictions, monitoring and recordkeeping and reporting for these rules. Therefore, Ohio EPA will not be removing these rules and terms and conditions from the permit.

The agency has agreed to remove Additional Terms and Conditions listed under b)(2)(i)(ii.) and b)(2)(i)(iii.) but will not remove The Additional Term and Condition listed under b)(2)(i)(i.).



5. Topic: Certification Requirements (Item #6)

- a. Comment: The company is opposed to this applicable rule, emission limitation, and corresponding record keeping and reporting requirements listed in b)(1)f and b)(1)h. The federal regulation is applicable to the manufacturer of the engine and since this engine has already been purchased and is already certified, the company requests terms associated with engine certification be removed.
- b. Response: In b)(1)f., 40 CFR 89.113 is listed as an applicable rule. This rule addresses smoke emission standards for compression ignition nonroad engines. Through rules 40 CFR 60.4204(b) and 40 CFR 60.4201(a), 40 CFR 89.113 is an applicable rule. 40 CFR 60.4204(b) addresses emission standards for owners and operators and specifically states "Owners and operators of 2007 model year and later non-emergency stationary CI ICE with a displacement of less than 30 liters per cylinder must comply with the emission standards for new CI engines in **40 CFR 60.4201** for their 2007 model year and later stationary CI ICE, as applicable." 40 CFR 60.4201(a) states "Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later non-emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 kilowatt (KW) [3,000 horsepower (HP)] and a displacement of less than 10 liters per cylinder to the certification emission standards for new nonroad CI engines in 40 CFR 89.112, **40 CFR 89.113**, 40 CFR 1039.101, 40 CFR 1039.102, 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, and 40 CFR 1039.115, as applicable, for all pollutants, for the same model year and maximum engine power." Therefore, through these two rules, 40 CFR 89.113 is an applicable rule and Ohio EPA will not be removing this rule and terms and conditions from this permit.

6. Topic: MACT ZZZZ Applicability (Item #7)

- a. Comment: Ohio EPA has not been delegated enforcement authority for this federal regulation and, as such, the company requests that this applicable rule be removed from section b)(1)i.
- b. Response: This rule reference will be removed from the applicable emissions limitations and/or control requirements table listed as b)(1)i.

7. Topic: Materials Restrictions (Item #10)

- a. Comment: Provide the basis for the restrictions on materials listed in c)(2) and c)(6) to be processed in the grinder. The emissions calculations are not based on material types, so there is no association between the material types and compliance with applicable emissions limitations; therefore, it appears this restriction is not necessary and it is requested this restriction and record keeping requirement be removed from the permit.
- b. Response: Ohio EPA listed material types identified in the Emission Activity Category (EAC) form in the application. However, Ohio EPA does agree that emission calculations are not based on material types and therefore material restrictions listed in c)(2) and record keeping requirements listed in d)(6) would not be necessary and will be removed from the permit.

8. Topic: Engine Particulate Filter (Item #11)

- a. Comment: This engine does not have a diesel particulate filter and, as such, restrictions, record keeping, and reporting requirements listed in c)(5), d)(9), and e)(5) should be removed from the permit.



- b. Response: The company has confirmed that this engine does not use a diesel particulate filter; therefore, the operational restriction, record keeping, and reporting requirements associated with this filter listed in c)(5), d)(9), and e)(5) are not necessary and will be removed from the permit.

9. Topic: Control Measures Tally (Item #12)

- a. Comment: The record keeping requirement listed in d)(4)d. is redundant and is not based on an associated quarterly applicable emissions limitation or control measure requirement. The company is required to maintain this information on a daily basis which is more stringent than a quarterly basis and requests the removal of this record keeping requirement.
- b. Response: The record keeping requirement listed in d)(4)d. is part the standard terms and conditions used for any material handling operations in the state of Ohio and will not be removed from the permit.

10. Topic: NOx Emissions Calculations (Item #13)

- a. Comment: The annual limits cannot be exceeded due to the operating restriction; therefore, the monthly record keeping and quarterly reporting listed in d)(5)d through d)(5)f and e)(1)a.i. associated with these terms and conditions are unnecessary and the company requests it be removed from the permit.
- b. Response: Ohio EPA agrees with this comment and will remove the monthly record keeping and quarterly reporting associated with NOx emissions under d)(5)d. through d)(5)f., and e)(1)a.i., respectively.



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Erie Materials, Inc.**

Facility ID:	0322022008
Permit Number:	P0115490
Permit Type:	Initial Installation
Issued:	2/4/2014
Effective:	2/4/2014
Expiration:	2/4/2019



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Erie Materials, Inc.

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Final Permit-to-Install and Operate
Erie Materials, Inc.
Permit Number: P0115490
Facility ID: 0322022008
Effective Date: 2/4/2014

Authorization

Facility ID: 0322022008
Application Number(s): A0048946
Permit Number: P0115490
Permit Description: Initial installation PTIO for emissions unit P902 (portable shingle/RAP grinder powered by 600 hp diesel-fired engine). This unit was previously operating at a de minimis level but applied for an initial installation permit to address increased operations.
Permit Type: Initial Installation
Permit Fee: \$750.00
Issue Date: 2/4/2014
Effective Date: 2/4/2014
Expiration Date: 2/4/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Erie Materials, Inc.
4507 Tiffin Avenue
Sandusky, OH 44871

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:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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


Craig W. Butler
Interim Director



Authorization (continued)

Permit Number: P0115490

Permit Description: Initial installation PTIO for emissions unit P902 (portable shingle/RAP grinder powered by 600 hp diesel-fired engine). This unit was previously operating at a de minimis level but applied for an initial installation permit to address increased operations.

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

Emissions Unit ID:	P902
Company Equipment ID:	P902, Beast Grinder
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Erie Materials, Inc.
Permit Number: P0115490
Facility ID: 0322022008
Effective Date: 2/4/2014

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 [DO/LAA] 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 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 emission 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.

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
Erie Materials, Inc.
Permit Number: P0115490
Facility ID: 0322022008
Effective Date: 2/4/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Erie Materials, Inc.

Permit Number: P0115490

Facility ID: 0322022008

Effective Date: 2/4/2014

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.
2. The permittee is advised that this facility is subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63 Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). Refer to 40 CFR 63.6590(c)(1) for specific requirements in this case. The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements have not been delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



Final Permit-to-Install and Operate
Erie Materials, Inc.
Permit Number: P0115490
Facility ID: 0322022008
Effective Date: 2/4/2014

C. Emissions Unit Terms and Conditions



1. P902, Beast 2 Grinder

Operations, Property and/or Equipment Description:

Portable 150 TPH RAS/RAP grinder powered by 600 HP non-spark diesel-fired engine

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)a., b)(2)a., b)(2)e., b)(2)f., c)(1), d)(5), e)(1), and f)(1)c. through f)(1)j.

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(D)	<p><u>Fugitive Emissions from Grinding, Transferring, and Loading:</u></p> <p>0.09 ton fugitive particulate matter less than ten microns in size (PM10) per rolling, 12-month period.</p> <p>Visible fugitive particulate emissions (PE) shall not exceed twenty percent opacity, as a three-minute average.</p> <p>See b)(2)a., b)(2)b., b)(2)e., b)(2)f., and c)(1).</p> <p><u>Diesel Combustion Emissions:</u></p> <p>3.96 lbs nitrogen oxides (NOx)/hour; 3.96 tons NOx per rolling, 12-month period.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>3.44 lbs carbon monoxide (CO)/hour; 3.44 tons CO per rolling, 12-month period.</p> <p>0.13 lb volatile organic compounds (VOC)/hour; 0.13 ton VOC per rolling, 12-month period.</p> <p>0.0063lb sulfur dioxide (SO₂)/hour; 0.0063 ton SO₂ per rolling, 12-month period.</p> <p>0.12 lb PM₁₀/hour; 0.12 ton PM₁₀ per rolling, 12-month period.</p> <p>See b)(2)a. and c)(1).</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	<p>40 CFR Part 60, Subpart IIII</p> <p>40 CFR 60.4204(b)</p> <p>40 CFR 60.4201(a)</p> <p>Table 1 to 40 CFR 89.112, Tier 3</p>	<p>The exhaust emissions from this engine shall not exceed:</p> <p>0.20 gram particulate matter (PM)/kW-hr</p> <p>4.0 grams NO_x + non-methane hydrocarbons (NMHC)/kW-hr</p> <p>3.5 grams CO/kW-hr</p> <p>[The emission limitations based on this rule are less stringent than the emission limitations established under OAC rule 3745-31-05(D).]</p> <p>See b)(2)(g through i).</p>
e.	<p>40 CFR 60.4207(b)</p> <p>40 CFR 80.510(b)</p>	<p>The sulfur content of the diesel fuel burned in this emissions unit shall not exceed 15 ppm or 0.0015% sulfur by weight.</p> <p>See b)(2)i., c)(4), d)(7), and e)(4).</p>
f.	<p>40 CFR 89.113</p> <p>(certified by manufacturer)</p>	<p>20% opacity during the acceleration mode</p> <p>15% opacity during the lugging mode</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		50% opacity during the peaks in either the acceleration or lugging modes
g.	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.
h.	OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is less stringent than the emission limitation established for particulate emissions (PE) pursuant to 40 CFR Part 60, Subpart IIII.
i.	OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).
j.	OAC rule 3745-110-03(F)	This emissions unit is exempt from the requirements of OAC rule 3745-110-03(F) pursuant to OAC rule 3745-110-03(K)(3).
k.	OAC rule 3745-17-07(B)	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable. See b)(2)j.
l.	OAC rule 3745-17-08(B)	This emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), the emissions unit is exempt from the requirements of OAC rule 3745-17-08. See b)(2)j.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1):



- i.. 0.09 ton fugitive PM10 per rolling, 12-month period;
 - ii. Visible fugitive particulate emissions (PE) shall not exceed twenty percent opacity, as a three-minute average;
 - iii. 3.96 lbsNOx/hour; 3.96 tons NOx per rolling, 12-month period;
 - iv. 3.44 lbs CO/hour; 3.44 tons CO per rolling, 12-month period;
 - v. 0.13 lb VOC/hour; 0.13 ton VOC per rolling, 12-month period;
 - vi. 0.0063lb SO2/hour; 0.0063 ton SO2 per rolling, 12-month period; and
 - vii. 0.12 lb PM10/hour; 0.12 ton PM10 per rolling, 12-month period.
- b. All PM10 emissions are particulate emissions.
- c. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with OAC rule 3745-31-05(D), OAC rule 3745-17-07(A), 40 CFR, Part 60, Subpart IIII and compliance with the terms and conditions of this permit.

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, then the requirements of OAC rule 3745-31-05(A)(3), as effective November 30, 2001, will no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- d. 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)(a) do not apply to the NOx, CO, VOC, PM10, and SO2 emissions from this air contaminant source since the calculated potential to emit for each pollutant is less than 10 tons per year, taking into account the federally enforceable restrictions established under OAC rule 3745-31-05(D).



- e. The permittee has committed to employ the following control measures for the material handling operations associated with the grinder, for the purpose of ensuring compliance with the above-mentioned applicable requirements:

Material Handling/Processing Operation	Control Measures
loading and unloading	wet application, as necessary*
grinding	wet application, as necessary*
transfer and conveying	wet application, as necessary*

*If at any time the moisture content of the material processed or handled is not sufficient to meet the above applicable requirements, the permittee shall employ a wet suppression control system to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- f. The above-identified control measures shall be implemented if the permittee determined as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the visible particulate emissions requirement. Any required implementation of the control measures shall continue until further observation and documentation demonstrates that use of the control measures is unnecessary.
- g. 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 (and standards of performance for stationary CI ICE).
- h. The stationaryCI ICE has been 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.
- i. The quality of the diesel fuel burned in this emissions unit shall meet the following specification on an "as received" basis:
 - a. 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.

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



- j. This emissions unit is a portable source and is applicable to the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit potential to emit [See b)(2)a.]:

- a. The maximum annual operating hours for this emissions unit shall not exceed 2,000 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	222
1-2	444
1-3	666
1-4	888
1-5	1,110
1-6	1,332
1-7	1,554
1-8	1,776
1-9	2,000
1-10	2,000
1-11	2,000
1-12	2,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

- (2) 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).



(3) 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.

(4) The permittee shall burn only diesel fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) Except as otherwise provided in this section, the permittee shall perform inspections of the grinding, transferring, and material handling operations in accordance with the following frequencies:

<u>Grinding and material operations</u>	<u>minimum inspection frequency</u>
All	Each day of operation

(3) The purpose of the inspections is to determine the need for implementing the above-mentioned additional control measures for emissions of fugitive dust. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for this grinding, transferring, and material handling operation if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

(4) The permittee shall maintain daily records of the following information:

- 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 measure(s);
- c. the dates the control measure(s) was (were) implemented; and
- d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in d)(4)d. shall be kept separately for each material processing operation identified above (grinding, transferring, and material handling), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

(5) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the operating hours for each month;
- b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours; and



- c. during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

- (6) 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.

- (7) 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.

- e) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; and the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.
 - 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).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September),



unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 in term number d)(4) above:
 - a. each day during which an inspection was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or instance(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that all inspections were performed by the required frequency and control measure(s) were properly implemented.

- (4) 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.
- f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section 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 was purchased certified to the opacity standards of 40 CFR 89.113. Therefore, compliance with the opacity imitations above shall be assumed.



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 OAC rule 3745-17-03(B)(1).

c. Opacity Limitation:

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

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.

d. Emission Limitation:

0.09 ton fugitive PM10 per rolling, 12-month period from grinding, transferring, and loading

Applicable Compliance Method:

The rolling, 12-month fugitive PM10 limitation was developed by multiplying the maximum annual production rate of 300,000 tons/year, which is the maximum annual throughput based on the annual hours of operation restriction established in c)(1), for the beast grinder by an emission factor of 0.00054lb PM10/ton from AP-42, Table 11.19.2-2 (revised 08/04), for the one transfer point by an emission factor of 0.0005 lb PM10/ton from AP-42, Table 11.19.2-2 (revised 08/04), and for loading operations by an emission factor of 0.00001 lb PM10/ton from AP-42, Table 13.2.4-1 (revised 11/06), then dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the annual hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.

e. Emission Limitation:

3.96 lbsNOx/hour; 3.96 tonsNOx per rolling, 12-month period from diesel combustion emissions

Applicable Compliance Method:

The hourly emission limitation was established based on emission ratings provided by the vendor conformance certificate/product information. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.



The annual emission limitation was established by multiplying the hourly emission limitation by the annual hours of operation restriction (2,000 hours/year) and then dividing by 2,000 pounds/ton. Therefore, provided the permittee demonstrates compliance with the annual hours of operation restriction, compliance with the annual emission rate shall also be demonstrated.

f. Emission Limitation:

3.44 lbs CO/hour; 3.44 tons CO per rolling, 12-month period from diesel combustion emissions

Applicable Compliance Method:

The hourly emission limitation was established based on emission ratings provided by the vendor conformance certificate/product information. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the annual hours of operation restriction (2,000 hours/year) and then dividing by 2,000 pounds/ton. Therefore, provided the permittee demonstrates compliance with the annual hours of operation restriction, compliance with the annual emission rate shall also be demonstrated.

g. Emission Limitation:

0.13 lb VOC/hour; 0.13 ton VOC per rolling, 12-month period from diesel combustion emissions

Applicable Compliance Method:

The hourly emission limitation was established based on emission ratings provided by the vendor conformance certificate/product information. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 20, or 2A, as appropriate, of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the annual hours of operation restriction (2,000 hours/year) and then dividing by 2,000 pounds/ton. Therefore, provided the permittee demonstrates compliance with the annual hours of operation restriction, compliance with the annual emission rate shall also be demonstrated.

h. 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 SO₂/MMBtu.

i. Emission Limitation:

0.0063lb SO₂/hour; 0.0063 ton of SO₂ per rolling, 12-month period from diesel combustion emissions

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying 0.0015 lb SO₂/MMBtu, the emission standard requirement of 40 CFR 80.510(b), by a conversion factor of 0.007 MMBtu/hp-hr from AP-42, Chapter 3.3 (revised 10/1996) by a maximum 600 horsepower. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the annual hours of operation restriction (2,000 hours/year) and then dividing by 2,000 pounds/ton. Therefore, provided the permittee demonstrates compliance with the annual hours of operation restriction, compliance with the annual emission rate shall also be demonstrated.

j. Emission Limitation:

0.12 lb PM₁₀/hour; 0.12 ton PM₁₀ per rolling, 12-month period from diesel combustion emissions

Applicable Compliance Method:

The hourly emission limitation was established based on emission ratings provided by the vendor conformance certificate/product information. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M.

The annual emission limitation was established by multiplying the hourly emission limitation by the annual hours of operation restriction (2,000 hours/year) and then dividing by 2,000 pounds/ton. Therefore, provided the permittee demonstrates compliance with the annual hours of operation restriction, compliance with the annual emission rate shall also be demonstrated.

(2) 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:

- a. 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



- b. 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) The permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate exemption requirements have been met and following the approval of the Director (the appropriate Ohio EPA District Office or local air agency). The Director may issue a “Notice of Site Approval” if the following criteria is met, pursuant to the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):

- a. the portable source is operated in compliance with any applicable best available technology (BAT) determination issued in a permit and all applicable state and/or federal rules and laws;
- b. the portable source is operating pursuant to a currently effective PTIO or PTI and/or permit to operate (PTO) and continues to comply with the requirements of the permit;
- c. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation;
- d. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance and would be acceptable under OAC rule 3745-15-07; and
- e. the Director has issued a “Notice of Site Approval”, stating that the proposed site is acceptable and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site.

The portable source can be relocated upon receipt of the Director’s “Notice of Site Approval” for the site.

- (2) 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, the



Final Permit-to-Install and Operate

Erie Materials, Inc.

Permit Number: P0115490

Facility ID: 0322022008

Effective Date: 2/4/2014

permittees shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. 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.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. 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.