



7/10/2014

Certified Mail

Chuck Perito
Rosby Resource Recycling
54 East Schaaf
Brooklyn, OH 44131

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318118703
Permit Number: P0117068
Permit Type: Administrative Modification
County: Cuyahoga

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 Cleveland Division of Air Quality at (216)664-2297 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: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Rosby Resource Recycling**

Facility ID:	1318118703
Permit Number:	P0117068
Permit Type:	Administrative Modification
Issued:	7/10/2014
Effective:	7/10/2014
Expiration:	6/7/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
Rosby Resource Recycling

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
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?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. F001, Tub Grinder #2.....	11



Final Permit-to-Install and Operate
Rosby Resource Recycling
Permit Number: P0117068
Facility ID: 1318118703
Effective Date: 7/10/2014

Authorization

Facility ID: 1318118703
Application Number(s): M0002840
Permit Number: P0117068
Permit Description: Agency-initiated Administrative Modification to remove the tub grinder (F001) from the general permits and to add monitoring and recordkeeping requirements associated with the grinding of asphalt shingles.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 7/10/2014
Effective Date: 7/10/2014
Expiration Date: 6/7/2022
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Rosby Resource Recycling
2890 West 3rd Street
Cleveland, OH 44133

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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
Director



Final Permit-to-Install and Operate
Rosby Resource Recycling
Permit Number: P0117068
Facility ID: 1318118703
Effective Date: 7/10/2014

Authorization (continued)

Permit Number: P0117068

Permit Description: Agency-initiated Administrative Modification to remove the tub grinder (F001) from the general permits and to add monitoring and recordkeeping requirements associated with the grinding of asphalt shingles.

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

Emissions Unit ID:	F001
Company Equipment ID:	Tub Grinder #2
Superseded Permit Number:	P0110215
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Rosby Resource Recycling
Permit Number: P0117068
Facility ID: 1318118703
Effective Date: 7/10/2014

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
Rosby Resource Recycling
Permit Number: P0117068
Facility ID: 1318118703
Effective Date: 7/10/2014

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Rosby Resource Recycling

Permit Number: P0117068

Facility ID: 1318118703

Effective Date: 7/10/2014

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.



Final Permit-to-Install and Operate
Rosby Resource Recycling
Permit Number: P0117068
Facility ID: 1318118703
Effective Date: 7/10/2014

C. Emissions Unit Terms and Conditions



1. F001, Tub Grinder #2

Operations, Property and/or Equipment Description:

Doppstadt (Model AK530) 60 ton/hour tub grinder. The grinder will be used to grind asphalt shingles for recycling. The grinder also has the ability to grind yard and agricultural wastes, vegetables, fruits, grains, and non-asbestos containing construction and demolition debris. The 530 horsepower engine powering the grinder is attached and intergral to the grinder.

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. None.

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.	ORC 3704.03(T) (PTIO P0110215, issued 6/7/2012)	Visible particulate emissions (PE) from any fugitive dust source shall not exceed twenty percent opacity as a three-minute average. Particulate matter of ten microns or less (PM ₁₀) emissions shall not exceed more than 6.2 tons per year.
b.	OAC rule 3745-31-05(F)	Work practices and operational restriction to minimize or eliminate emissions of fugitive dust. See b)(2)a., b)(2)b., and c)(1) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The visible particulate emission limitation specified by this rule is equivalent to the visible particulate emission limitation established pursuant to ORC 3704.03(T).
d.	OAC rule 3745-17-08(B)	The reasonably available control measures specified by this rule are measures established pursuant to OAC rule 3745-31-05(F).

(2) Additional Terms and Conditions

- a. The permittee has committed to employing the best available control measures for the tub grinder and the loading/unloading activities associated with the tub grinder, for the purpose of ensuring compliance with the visible particulate emission limitation established in this permit.

The permittee shall employ continuous water sprays and other watering or wetting activities on an “as needed” basis to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures instead of, or in addition to, water sprays, including the processing of materials with inherent moisture sufficient to meet the visible particulate emission limitation of this permit.

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.

- b. The permittee shall post a sign prohibiting the acceptance of any asbestos containing material (ACM). The permittee shall also post and maintain a sign at the facility entrance identifying, at a minimum, the name of the permittee, the hours of operation, and the authorized wastes.
- c. The permittee shall train all staff at least once a calendar year. The training shall include identification of waste, safety, and proper management and handling of all wastes and materials on-site.
- d. Incidental wastes processed in this emissions unit shall not exceed a total of five percent (5%) by weight of the overall load.



c) Operational Restrictions

- (1) The maximum operating hours for this emissions unit shall not exceed 4,500 hours per calendar year.
- (2) The permittee shall process only the following materials in this emissions unit:
 - a. yard waste*
 - b. agricultural waste*
 - c. animal waste*
 - d. processed and/or unprocessed vegetables, fruits, or grains*
 - e. non-asbestos (Category I or Category II) containing construction and demolition debris in this emissions unit.

* Feedstock types A, B, C, D, and D1 for composting facilities from OAC rule 3745-27-40

- (3) The facility shall not accept for processing any regulated ACM as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141 and OAC rule 3745-20, or any subsequent revisions to either rule.
- (4) Upon identification of any ACM, the permittee shall immediately transport the ACM to a landfill that is permitted to accept ACM.
- (5) The permittee shall not accept the following materials:
 - a. material from any source other than residential and/or former residential sources unless the material has been sampled and tested for asbestos;
 - b. any rolled or commercial roofing materials;
 - c. any asphalt siding shingle wastes;
 - d. any hazardous or special wastes; or
 - e. other construction and demolition waste other than that which may be incidentally associated with post-consumer asphalt roofing shingle waste from residential sources (i.e. tarpaper, wood, metal, nails, etc.).

d) Monitoring and/or Recordkeeping Requirements

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

Grinding and material handling

Minimum inspection frequency

All

Each day of operation



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 inspections shall be necessary for this grinding and material handling operation if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements, including ORC 3704.03(T).

- (2) The permittee shall maintain monthly records of the hours of operation of this emissions unit.
- (3) The permittee shall maintain a record of each instance any material other than those permitted in c)(2) was processed.
- (4) Prior to processing any materials, the permittee shall inspect all materials being accepted in order to determine whether or not ACM is present. If ACM is identified, the permittee shall record the following information:
 - a. date of delivery of the asbestos-containing materials;
 - b. physical description of the asbestos-containing materials;
 - c. the amount of the asbestos-containing materials; and
 - d. the name and location of the landfill used to dispose of the asbestos-containing materials.

All personnel inspecting loads of incoming material shall be trained in the identification of ACM.

- (5) The permittee shall develop and implement an ACM sampling plan and shall sample at a frequency adequate to safeguard against accidental processing of ACM. This plan shall be submitted for approval to the Cleveland Division of Air Quality (Cleveland DAQ) within 60 days of final issuance of this PTIO. Based on a history of sampling, the program may be modified at the request of the Cleveland DAQ or the company and can only be implemented following the Cleveland DAQ's approval.
- (6) Loads that are suspected of containing ACM should be set aside and sampled in accordance with ASTM Standards for asbestos prior to processing. If any asbestos is identified, then that load shall not be processed and shall be sent to an asbestos-approved landfill.

All samples shall be analyzed using Polarized Light Microscopy (PLM), EPA Test Method 600/R-93-116, OSHA testing method number ID-101, or an equivalent test method approved by Ohio EPA.

The permittee shall receive the analytical test results identifying whether asbestos is present in the post-consumer pre-processed load prior to processing the sampled load.

The permittee shall reject all loads that test positive for asbestos. The permittee may, however, retest such loads to verify the test result prior to rejection. Rejected loads shall be disposed of at a permitted asbestos waste facility.



- (7) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the material handling operations that are not adequately enclosed (all grinding activity, all material handling activity, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if unknown, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal (<http://ebiz.epa.ohio.gov>); or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director 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 for visible emissions in d)(7) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;



- b. all days during which any visible fugitive particulate emissions were observed from the material handling operation that are not adequately enclosed (all grinding activity, all material handling activity, etc.) serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, the permittee shall determine compliance with this limitation through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

b. Emission Limitation:

6.2 tons of PM₁₀ per year.

Applicable Compliance Method:

The permittee shall determine compliance with this limitation by using the following calculation:

$$(X \text{ tons of material processed per year}) \times (0.024 \text{ lb PE/ton of material processed}) \times (0.60 \text{ lb PM}_{10} \text{ per pound of PE}) = Y \text{ tons PM}_{10} \text{ per year}$$

Where:

X = tons of material processed during the year

Y = annual PM₁₀ emission rate

g) Miscellaneous Requirements

(1) Sample emissions calculations for fee reporting purposes:

Uncontrolled potential emissions (assume 60% of PE is PM₁₀):

$$(950 \text{ TPH} \times 0.024 \text{ lb of PE/ton of material processed}) \times (8,760 \text{ hours per year}) / 2,000 \text{ lbs per ton} = 99.9 \text{ tons per year of PE.}$$



Controlled emissions using water sprays (80% efficient)

$(99.9 \text{ tons/year}) \times (1 - 0.80) = 20 \text{ tons/year of PE}$

Controlled emissions with the unit operating for 4,500 hours/year:

$20 \text{ tons/year} \times (4,500 \text{ hours}/8,760 \text{ hours}) = 10.3 \text{ tons/year PE and } 6.2 \text{ tons/year PM}_{10}$

(2) At the discretion and following the approval of the Director (the appropriate Ohio EA District Office or local air agency), 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 notification and exemption requirements have been met. The Director may issue a "Notice of Site Approval" through either of the following scenarios:

- a. Where future locations of the proposed portable source are unknown, the approval to relocate the portable source shall be acquired in accordance with the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):
 - i. 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;
 - ii. 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 this permit;
 - iii. 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 by submitting a "Notice of Intent to Relocate a Portable Source";
 - iv. 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
 - v. 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;

or

- b. As the alternative for any pre-disclosed location, the Director may issue a "Notice of Site Approval" if the portable source meet the requirements of OAC rule 3745-31-05(H), as follows:



- i. the portable source is operating pursuant to a currently effective permit-to-install (PTI), permit-to-install and operate (PTIO), or has been approved for registration status and continues to comply with the requirements of the permit and any applicable state and/or federal rules;
- ii. the portable source has been issued a PTIO or PTI and the permittee continues to comply with the requirements of the permit, including any applicable best available technology (BAT) determination;
- iii. the portable source owner has identified and submitted the proposed site to the Ohio EPA prior to the scheduled relocation using the "Notice of Intent to Relocate a Portable Source" form;
- iv. the permitting District Office/local air agency and the District Office/local air agency having jurisdiction over the new site (if different) have determined that the portable source will have an acceptable environmental impact at the proposed site;
- v. a public notice, meeting the requirements OAC rule 3745-47, is published in the county where the proposed site is located;
- vi. the owner of the proposed site (if not the permittee) has provided the portable source owner with approval, or an equivalent declaration, that it is acceptable to move the portable source to the proposed site; and
- vii. the permittee has provided the Ohio EPA within a minimum of 15-day written notice of the relocation.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site. Any site approval issued by the Ohio EPA pursuant to OAC rule 3745-31-05(H), is subject to expiration and renewal. Pursuant to OAC rule 3745-31-07(C)(3), any site approval for a portable source shall be issued for a period of time determined to be appropriate by the Director and the renewal will be reevaluated and subject to the same requirement above.

- (3) 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 permittee 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 the 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 a Portable Source" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable



Final Permit-to-Install and Operate

Rosby Resource Recycling

Permit Number: P0117068

Facility ID: 1318118703

Effective Date: 7/10/2014

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.