Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

Certified Mail

9/25/2015

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

JOHN W SPENCER
MULCH MANUFACTURING INC
6747 TAYLOR RD SW
REYNOLDSBURG, OH 43068

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0145000331
Permit Number: P0083679
Permit Type: Renewal
County: Licking

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, Central District Office at (614)728-3778or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-CDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
MULCH MANUFACTURING INC

Facility ID:	0145000331
Permit Number:	P0083679
Permit Type:	Renewal
Issued:	9/25/2015
Effective:	9/25/2015
Expiration:	9/25/2025

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
MULCH MANUFACTURING INC

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Authorization

Facility ID:	0145000331
Application Number(s):	A0014070, A0053753
Permit Number:	P0083679
Permit Description:	PTIO Renewal permit for mulch processing plant including storage piles, transfer points, colored mulch storage piles, and Cheetah mulch color machine
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	9/25/2015
Effective Date:	9/25/2015
Expiration Date:	9/25/2025

Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

MULCH MANUFACTURING INC
6747 TAYLOR RD SW
Reynoldsburg, OH 43068

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

Authorization (continued)

Permit Number: P0083679
Permit Description: PTIO Renewal permit for mulch processing plant including storage piles, transfer points, colored mulch storage piles, and Cheetah mulch color machine

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

Emissions Unit ID:	**F002**
Company Equipment ID:	storage piles
Superseded Permit Number:	01-8029
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F003**
Company Equipment ID:	transfer points
Superseded Permit Number:	01-8029
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F004**
Company Equipment ID:	Storage piles
Superseded Permit Number:	01-12035
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Mulch Coloring Operation
Superseded Permit Number:	01-12035
General Permit Category and Type:	Not Applicable

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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

B. Facility-Wide Terms and Conditions

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.

C. Emissions Unit Terms and Conditions

1. F002, storage piles

Operations, Property and/or Equipment Description:

Storage Piles

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.	Storage Piles - Load-in and load-out of storage piles OAC rule 3745-31-05 (A)(3)	Particulate emissions shall not exceed 1.20 tons PE/yr. No visible emissions except for 3 minutes in any hour. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections b)(2)a. through b)(2)d.)
b.	Storage Piles - Wind erosion from storage piles OAC rule 3745-31-05 (A)(3)	Particulate emissions shall not exceed 6.15 tons PE/yr. No visible emissions except for 3 minutes in any hour. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections b)(2)a. through b)(2)d.)
c.	OAC 3745-17-08(A)(1)	See Section b)(2)e.
d.	OAC 3745-17-07(B)(11)(e)	See Section b)(2)f.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to reduce the volume of product in storage piles if possible, store more product in raw form rather than finished form if possible, and limit operations during poor weather conditions to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

c. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to reduce the volume of product in storage piles if possible, store more product in raw form rather than finished form if possible, and limit operations during poor weather conditions to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

e. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

f. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-in inspection frequency
Hardwood Raw Bark	weekly
Ground Hardwoods	weekly
Ground Cypress	weekly
Finished Hardwoods	weekly

(2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-out inspection frequency
Hardwood Raw Bark	weekly
Ground Hardwoods	weekly
Ground Cypress	weekly
Finished Hardwoods	weekly

(3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification	minimum wind erosion inspection frequency
Hardwood Raw Bark	weekly
Ground Hardwoods	weekly
Ground Cypress	weekly
Finished Hardwoods	weekly

(4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(5) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

(6) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if

operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and,

d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA Central District Office 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.

(2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to Ohio EPA, Central District Office.

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. <u>Emission limitation:</u>
No visible emissions except for 3 minutes in any hour.

<u>Applicable Compliance Method:</u>
Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

b. Emission limitation:
Particulate emission from load-in and load-out shall not exceed 1.20 tons PE/yr.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the average volume, in tons, of each separate storage pile by the RACM emission factor of 1.0 lb per ton. Then multiply that number by the percentage of each mulch pile that the emission factor is applicable to (based on sawdust size range of particles: 25% for Hardwood Raw Bark, 26% for Ground Hardwoods, 17% for Ground Cypress and 47% for Finished Hardwood) and add the emissions from each pile together.

4,400 tons x 1.0 lb PE/ton x 25% / 2,000 lbs/ton = 0.55 tons PE/yr
440 tons x 1.0 lb PE/ton x 26% x / 2,000 lbs/ton = 0.06 tons PE/yr
6,600 tons x 1.0 lb PE/ton x 17% x / 2,000 lbs/ton = 0.56 tons PE/yr
110 tons x 1.0 lb PE/ton x 47% x / 2,000 lbs/ton = 0.03 tons PE/yr
Total = 1.20 tons PE/yr

c. Emission limitation:
Particulate emission from wind erosion shall not exceed 6.15 tons PE/yr.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the emission factor from EPA-450/2-92-004* [9/1992], Equation 2-12,

E_{TSP} = 1.7 x (s/1.5) x ((365-p)/235) x (f/15) **

for each product by the surface area, A, of the piles for each product, sum the daily emission rates, then multiply by 365 days per year and divide by 2000 lb per ton.

* Fugitive Dust Background Document and Technical Support Document for Best Available Control Measures

** where
E_{TSP} = total suspended particulate emission factor, pounds per day per acre,
s = silt content, 40%,
p = number of days with ≥ 0.01 inch of precipitation per year, 140,
f = percentage of time that the unobstructed wind speed exceeds 12 mph at the mean pile height, 30%,
A =2.50 x $(V)^{2/3}$ / 4840, the area of a storage pile of a product in acres, and
V = the volume of a storage pile of a product in cubic yards,

as shown in the following table for the emission limit:

Product	Silt, %	Volume, CY	Area, A	p, days	f, % > 12 mph	lb/day/A	lb/day
Raw Hardwood Bark	12	40,000	0.604	140	30	26.04	15.73
Ground Hardwoods	16	5,000	0.0604	140	30	34.72	2.09
Ground Cypress	11	45,000	0.653	140	30	23.87	15.60
Finished Hardwood	5	1,000	0.0246	140	30	10.85	0.27
Total, acres and #/day PE			1.34				33.69
Total E_{TSP}, TPY PE							6.15

g) Miscellaneous Requirements

None.

2. F003, transfer points

Operations, Property and/or Equipment Description:

Mulch transfer

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.	OAC rule 3745-31-05(A)(3)	Particulate emission shall not exceed 10.56 tons PE/yr. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections b)(2)a. through b)(2)d.) Visible particulate emissions shall not exceed twenty percent as a three-minute average.
b.	OAC 3745-17-08(A)(1)	See Section b)(2)e.
c.	OAC 3745-17-07(B)(11)(e)	See Section b)(2)f.

(2) Additional Terms and Conditions

a. The mulch transfer operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

All mulch transfer operations on-site.

b. The permittee shall employ best available control measures for the above-identified mulch transfer operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to reduce the volume of product in storage piles if possible, store more product in raw form rather than finished form if possible, use dust shield (conveyor hoods) on the discharge of conveyors, and limit operations during poor weather conditions to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c. For each mulch transfer operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the mulch transfer operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

d. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

e. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

f. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, for mulch transfer operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

mulch transfer operation(s)	minimum inspection frequency
Bark Loading - Hardwood	weekly
Loading Hopper - Hardwood	weekly
Loading Hopper - Cypress	weekly

Conveyor Discharge - Cypress	weekly
Bulk Loading Hopper	weekly
Bark Processing - Hardwood	weekly

(2) The above-mentioned inspections shall be performed during representative, normal operating conditions.

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

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

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 4.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA Central District Office 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.

(2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to Ohio EPA, Central District Office.

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. <u>Emission limitation:</u>
Visible particulate emissions shall not exceed twenty percent as a three-minute average.

Applicable Compliance Method:
Compliance with the visible emission limitations for the transfer points identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources")

b. Emission limitation:
Particulate emission shall not exceed 10.56 tons per year.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the volume, in tons, through each separate transfer point by the RACM emission factor of 1.0 lb per ton. Then multiply that number by the percentage of each transfer point throughput that the emission factor is applicable to (based on sawdust size range of particles: 25% for Hardwood Raw Bark, 26% for Ground Hardwoods, 17% for Ground Cypress and 47% for Finished Hardwood) and add the emissions from each pile together, and divide by the number of months in a year.

Bark Loading – Hardwood	
13,750 tons/yr x 1.0 lb PE/ton x 25% / 2,000 lbs/ton =	1.72 tons PE/yr
Loading Hopper – Hardwood	
1,430 tons/yr x 1.0 lb PE/ton x 26% / 2,000 lbs/ton =	0.19 tons PE/yr
Loading Hopper – Cypress	
6,600 tons/yr x 1.0 lb PE/ton x 17% / 2,000 lbs/ton =	0.56 tons PE/yr
Conveyor Discharge - Cypress	
29,920 tons/yr x 1.0 lb PE/ton x 17% / 2,000 lbs/ton =	2.54 tons PE/yr
Bulk Loading Hopper	
45,100 tons/yr x 1.0 lb PE/ton x 17% / 2,000 lbs/ton =	3.83 tons PE/yr
Bark Processing - Hardwood	
13,750 tons/yr x 1.0 lb PE/ton x 25% / 2,000 lbs/ton =	1.72 tons PE/yr
Total =	10.56 tons PE/yr

g) Miscellaneous Requirements

(1) None.

3. F004, Storage piles

Operations, Property and/or Equipment Description:

Colored Mulch Storage Piles

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.	OAC rule 3745-31-05(A)(3)	Emissions shall not exceed: 1.30 tons/year of fugitive particulate emissions (PE). No visible PE except for one minute during any 60-minute period Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See Sections b)(2)a. through b)(2)g.)
b.	OAC 3745-17-08(A)(1)	See Section b)(2)h.
c.	OAC 3745-17-07(B)(11)(e)	See Section b)(2)i.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to maintain minimal

drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance. The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

material processing operation(s)	control measure(s)
Storage Piles and Load In and Load Out system.	Inherent moisture/water suppression

c. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to perform one or more of the following: watering/sprinkling systems/hoses, covering the storage piles, and wind shields on the loadin conveyor head pulley, to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

e. Any fine materials dropping out of the process shall either be removed before they become airborne or be kept moist until they are removed.

f. Workers shall not clean any conveying or handling equipment with compressed air.

g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3).

h. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

i. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-in inspection frequency
all	daily

(2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-out inspection frequency
all	daily

(3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification	minimum wind erosion inspection frequency
all	daily

(4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(5) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

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

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in (6)d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA Central District Office 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.

(2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to Ohio EPA, Central District Office.

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. <u>Emissions Limitation:</u>
1.3 tons/year of fugitive PE

<u>Applicable Compliance Method:</u>
Compliance shall be demonstrated by summing the calculated the annual emission rates for load in/out of storage piles and the annual emission rate for wind erosion.

The emission factor for loadin/out is specified in US EPA's AP 42 Section 13.2.4 (11/06). The result is multiplied by the maximum annual production rate (2,628,000 tons/yr. PTI application 03/30/06). See the following calculations:

Storage Pile Load In and Out

$E= K(0.0032)[(U/5)^{1.3} / M/2)^{1.4}]$
Where:
E = emission factor (lb/ton)
k = particle size multiplier (dimensionless) (0.74)
U = mean wind speed, (mph) (8.7 mph)
M = material moisture content (60 %)

$0.74 \times (0.0032) \times [(8.7/5)^{1.3} / (60/2)^{1.4}] =$
(0.0024) [(2.05) / (117)] =
(0.0024) / 0.018 = 0.00004 lb PE/ ton

(0.00004) x (2,628,000 Tons/yr) x (2 load in and out) / 2000 lb/ton = 0.11 TPY PE

Wind Erosion

E = (1.7)(s/1.5)[365-p) / 235] (f/15)(365)(A) /2000
Where:

E = Emission factor
s = Silt content of the stored material (worst case estimate) (3%)
p = Number of days > 0.01 inch precipitation (Columbus station) (140 days)
f = Percent of time winds exceed 12 mph (Columbus station) (30%)
A = Total surface area of storage piles (worst case estimate) (1.0 acre).
Emission Factor from US EPA Fugitive Dust Background Document and Technical information Document for Best Available Control Measures (9/92).

(1.7) x (3/1.5) x [365-140) / 235] (30/15)
(1.7) (2) (0.96) (2.0)
6.53 lbs/day/acre
6.53 lbs/day x ((0.16 acre) x (365 days) / 2000 Lbs/ton = 0.19 TPY/ PE

Total 0.11 + 0.19 = 0.30 tons PE/yr

b. <u>Emission Limitation:</u>

There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period.

<u>Applicable Compliance Method:</u>
Compliance with the visible PE limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.

4. P002, Mulch Coloring Operation

Operations, Property and/or Equipment Description:

Cheetah Mulch Color Machine

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.	OAC rule 3745-31-05(A)(3)	Particulate emissions from the material handling shall not exceed 21 pounds per hour and 17.5 tons per year. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections b)(2)a. through b)(2)f. No visible emissions except for one minute in any hour.
b.	OAC 3745-17-08(A)(1)	See Section b)(2)g.
c.	OAC 3745-17-07(B)(11)(e)	See Section b)(2)h.

(2) Additional Terms and Conditions

a. The material processing and dyeing operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

All material processing operations related to dying of mulch and mulch color machine.

b. The permittee shall employ best available control measures for the above-identified material processing operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

material processing operation(s)	control measure(s)
All	Inherent moisture / water suppression system.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c. For each material processing operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material processing operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

d. Any fine materials dropping out of the process shall either be removed before they become airborne or be kept moist until they are removed.

e. Workers shall not clean any conveying or handling equipment with air pressure.

f. Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

g. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

h. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

c) Operational Restrictions

(1) This emissions unit shall not process more than 500,000 of tons of material per rolling 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

material processing operation(s)	minimum inspection frequency
All	Daily

(2) The above-mentioned inspections shall be performed during representative, normal operating conditions.

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

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

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

(5) The facility shall keep records of the tons of mulch that has been colored on a monthly basis and a rolling 12-month summation. These records shall be kept on site and available for review.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA Central District Office 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.

(2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to Ohio EPA, Central District Office.

f) Testing Requirements

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

a. Emission Limitation:
Particulate emissions from the material handling shall not exceed 21.0 pounds per hour and 17.5 tons per year.

Applicable Compliance Method:
Compliance shall be demonstrated by the calculated hourly emission rate for the mulch coloring operation. The emission factor specified in Ohio EPA RACM reference document 2.17-1 (1980) for sawdust from sawing is used as the basis. This basis shall be multiplied by an 80% emission control factor for the inherent moisture content of hardwood mulch compared to sawdust, and by the maximum hourly production rate (300 tons/hr; PTI application 03/30/06). See the following calculations:

Process emissions

Where:
E = (e)(p)(c)/2000

e = Emission factor (all emission units) = 0.00014 lb/ton
p = Maximum rated production capacity. (300 TPH)
c= Control factor (0.8).

0.35 Lb/ton (300TPH) (0.2) = 21 Lbs/Hr

Potential annual emission rate would result from limiting the process to 500,000 tons per year.

0.35 Lb/ton (500,000TPY Limit in application 4/5/06)(.2) /2000 = 17.5TPY PE

b. Emission limitation:
There shall be no visible emissions except for a period not to exceed one minute during any 60 minute observation period from storage piles.

Applicable Compliance Method:
Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.