



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

11/10/2015

Certified Mail

Mr. Tim Harvey
 Hope Timber Mulch Inc.
 141 Union St
 Newark, OH 43055

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: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318188705
 Permit Number: P0119521
 Permit Type: Initial Installation
 County: Cuyahoga

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall and Cleveland Division of Air Quality
 Permit Review/Development Section 2nd Floor
 Ohio EPA, DAPC 75 Erieview Plaza
 50 West Town Street Suite 700 Cleveland, OH 44114
 PO Box 1049
 Columbus, Ohio 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
 CDAQ; Pennsylvania; Canada

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Initial Installation
Hope Timber Mulch Inc.

1705 Noble Rd.,, East Cleveland, OH 44112

ID#:P0119521

Date of Action: 11/10/2015

Permit Desc:Initial PTIO for material storage piles (F002) and portable rotochopper FP-66 horizontal wood grinder and associated exempt non-road 540 HP diesel engine (F003)..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Hope Timber Mulch Inc.**

Facility ID:	1318188705
Permit Number:	P0119521
Permit Type:	Initial Installation
Issued:	11/10/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Hope Timber Mulch Inc.

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Draft Permit-to-Install and Operate

Hope Timber Mulch Inc.

Permit Number: P0119521

Facility ID: 1318188705

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1318188705
Application Number(s): A0054287
Permit Number: P0119521
Permit Description: Initial PTIO for material storage piles (F002) and portable rotochopper FP-66 horizontal wood grinder and associated exempt non-road 540 HP diesel engine (F003).
Permit Type: Initial Installation
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/10/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Hope Timber Mulch Inc.
1705 Noble Rd.
East Cleveland, OH 44112

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



Draft Permit-to-Install and Operate

Hope Timber Mulch Inc.

Permit Number: P0119521

Facility ID: 1318188705

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0119521

Permit Description: Initial PTIO for material storage piles (F002) and portable rotochopper FP-66 horizontal wood grinder and associated exempt non-road 540 HP diesel engine (F003).

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:	F002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	F003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Hope Timber Mulch Inc.
Permit Number: P0119521
Facility ID: 1318188705
Effective Date: To be entered upon final issuance

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 Cleveland Division of Air Quality 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.



Draft Permit-to-Install and Operate

Hope Timber Mulch Inc.

Permit Number: P0119521

Facility ID: 1318188705

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

Hope Timber Mulch Inc.

Permit Number: P0119521

Facility ID: 1318188705

Effective Date: To be entered upon final issuance

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) B.2
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The operations at this facility potentially pose a risk of releasing asbestos fibers into the ambient air due to the processing of asbestos-containing materials that has made the material become friable. Asbestos-containing materials are identified in Ohio Administrative Code (OAC) rule 3745-20. As a result, the permittee, and/or your employees, may be subject to the asbestos hazard education and training courses as prescribed by the Ohio Department of Health and OAC rule 3701-34. The Ohio EPA does not have delegation of authority to enforce the Ohio Department of Health regulations. The requirements of OAC rule 3701-34 shall be enforceable by the Ohio Department of Health. The complete requirements of the asbestos education and training regulations may be accessed via the internet at <https://www.odh.ohio.gov/rules/final/3701-30-39/3701-34.aspx>.



Draft Permit-to-Install and Operate
Hope Timber Mulch Inc.
Permit Number: P0119521
Facility ID: 1318188705
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F002, F002

Operations, Property and/or Equipment Description:

Storage piles and material handling associated with portable Rotochopper FP-66 Horizontal Wood 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.	OAC rule 3745-31-05(A)(3)	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)(6)	There shall be no visible emissions of fugitive dust from any material storage pile except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
c.	OAC rule 3745-17-08(B)	Utilize reasonably available control measures to prevent fugitive dust from becoming airborne. See b)(2)a. through b)(2)f.

(2) Additional Terms and Conditions

- a. The permittee shall employ reasonably 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 permittees' application, the permittee has committed to maintain minimal drop heights for stackers and front-loaders, and watering/sprinkling systems at sufficient treatment frequencies 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 reasonably 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: (chemical stabilization, watering/sprinkling systems/hoses, covering the storage piles) 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. Open-bodied vehicles transporting material likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- f. 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 3745-17-08(B).

c) Operational Restrictions

- (1) The facility shall not accept for processing any regulated asbestos-containing material 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. Regulated asbestos-containing material is defined to include:

- a. Friable asbestos material;
 - b. Category I non-friable asbestos-containing material that has become friable;
 - c. Category I non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting or abrading; and
 - d. Category II non-friable asbestos-containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by subpart M and OAC rule 3745-20.
- (2) Non-regulated asbestos-containing materials include asbestos containing building materials from single dwelling home demolitions having four or fewer units and are not part of a large scale project, Category I and II building materials (e.g., floor tile mastic, caulking and glazing compounds, etc.) determined to be in good condition or pliable, and building materials from demolition or renovation projects generating less than 160 linear feet, 260 square feet or 35 cubic feet of regulated asbestos-containing materials. The Category II asbestos containing materials cannot come from a regulated project.
- (3) The permittee shall be limited to accepting only non-regulated asbestos-containing materials. The permittee shall ensure that any non-regulated Category I and II nonfriable asbestos-containing materials accepted for processing will not become friable during processing; and asbestos-containing materials accepted for processing do not become crumbled, pulverized, or reduced to powder by the forces expected to act on the material during its handling and/or transfer at the operation. If any regulated asbestos-containing material arrives at the operation it cannot be accepted for processing; and if any non-regulated asbestos-containing becomes friable after it is accepted for processing the permittee shall:
- a. not cause or permit visible emissions from the non-regulated Category I or II asbestos-containing materials during on-site transportation, transfer, loading, or unloading operations; and
 - b. during the unloading, and loading of the non-regulated Category I or II asbestos-containing materials, assure that the operation is restricted adequately to deter unauthorized entry of the general public and any unauthorized personnel to within one hundred feet of the operations.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) **Work Practice Plan**
- The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees material storage piles. This work practice plan shall include, at a minimum, the following elements:
- a. An identification of each storage pile or each storage pile area for which the plan applies.

- b. A determination of the frequency that each storage pile or each storage pile area will be inspected to determine if additional control measures are needed. The frequency of inspection can either be common for all storage piles or may be identified separately for various storage pile areas.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the storage piles. This form/record should include, at a minimum, the following elements:
 - i. storage pile or storage pile area inspected;
 - ii. date inspected;
 - iii. name of employee responsible for the inspection;
 - iv. result of the inspection (needs treatment or does not need treatment);
 - v. a description of why no treatment was needed;
 - vi. date treated;
 - vii. name of employee responsible for treatment of the storage pile or storage pile area; and
 - viii. method used to treat the storage pile or storage pile area.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Cleveland Division of Air Quality (Cleveland DAQ) for review and approval. The permittee can begin using the revised Work Practice Plan once the Cleveland DAQ has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the storage piles or storage pile areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal storage pile operating conditions. No inspection shall be necessary for a storage pile or storage pile area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

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

- a. the records required to be collected under the Work Practice Plan; and

- b. the date and reason any element of the Work Practice Plan was not implemented.
- e) Reporting Requirements
 - (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the Cleveland DAQ.
 - (2) The permittee shall submit annual deviation reports concerning any failure to implement the Work Practice Plan. These reports shall be submitted as part of the annual Permit Evaluation Report (PER).
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ 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.
- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

There shall be no visible emissions of fugitive dust from any material storage pile except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible fugitive dust emission limitation for the storage piles identified above shall be determined in accordance with USEPA test method 22 as set forth in 40 CFR Part 60, Appendix A.
- g) Miscellaneous Requirements
 - (1) At the discretion and following the approval of the Cleveland Division of Air Quality (CDAQ), 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 Directory 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 to 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 the permit;
- iii. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the Cleveland Division of Air Quality (CDAQ) prior to the scheduled relocation;
- 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 OAX rule 3745-15-07; and
- v. the Directory 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 Directory may issue a "Notice of Site Approval" if the portable source meets 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;
 - iv. the Cleveland Division of Air Quality (CDAQ) and the District Office or 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 of 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 with a minimum of a 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 requirements above.

- (2) If the relocation on 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 3745-77-07, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the CDAQ. 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.



2. F003, F003

Operations, Property and/or Equipment Description:

Portable Rotochopper FP-66 Horizontal Wood Grinder and associated exempt non-road 540 HP diesel engine

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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)	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed twenty per cent opacity as a three-minute average.
b.	OAC rule 3745-17-08(B)	Utilize Reasonably Available Control Measures to prevent fugitive dust from becoming airborne. See b)(2)a. through b)(2)d. below.

(2) Additional Terms and Conditions

- a. The permittee shall employ reasonably available control measures for the grinding operations listed above as well as any associated material handling, 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 using a water spray bar as necessary to maintain compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. For each material handling and grinding operation that is not adequately enclosed, the above-identified control measure(s) in b)(2)a and b)(2)c 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 handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- c. Open-bodied vehicles transporting material likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- d. 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 3745-17-08(B).

c) Operational Restrictions

- (1) This facility shall not process any regulated asbestos-containing material 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 revisions to either rule. Regulated asbestos-containing material is defined to include:
 - a. Friable asbestos material;
 - b. Category I non-friable asbestos-containing material that has become friable;
 - c. Category I non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting or abrading; and
 - d. Category II non-friable asbestos-containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by subpart M and OAC rule 3745-20.
- (2) Non-regulated asbestos-containing materials include asbestos containing building materials from single dwelling home demolitions having four or fewer units and are not part of a large scale project, Category I and II building materials (e.g., floor tile mastic, caulking and glazing compounds, etc.) determined to be in good condition or pliable, and

building materials from demolition or renovation projects generating less than 160 linear feet, 260 square feet or 35 cubic feet of regulated asbestos-containing materials. The Category II asbestos containing materials cannot come from a regulated project.

- (3) The permittee shall be limited to accepting only non-regulated asbestos-containing materials. The permittee shall ensure that any non-regulated Category I and II nonfriable asbestos-containing materials accepted for processing will not become friable during processing; and asbestos-containing materials accepted for processing do not become crumbled, pulverized, or reduced to powder by the forces expected to act on the material during its handling and/or transfer at the operation. If any regulated asbestos-containing material arrives at the operation it cannot be accepted for processing; and if any non-regulated asbestos-containing becomes friable after it is accepted for processing the permittee shall:
 - a. not cause or permit visible emissions from the non-regulated Category I or II asbestos-containing materials during on-site transportation, transfer, material handling or grinding operations;
 - b. during the processing of the non-regulated Category I or II asbestos-containing materials, assure that the operation is restricted adequately to deter unauthorized entry of the general public and any unauthorized personnel to within one hundred feet of the operations.
- (4) The permittee shall not process the following materials in this emissions unit:
 - a. any rolled or commercial roofing materials;
 - b. any asphalt siding shingle wastes;
 - c. any hazardous or special wastes; or
 - d. 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) **Work Practice Plan**

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the grinding operation and associated material handling. This work practice plan shall include, at a minimum, the following elements:

- a. identification of each piece of grinding and material handling equipment for which the work practice plan applies.
- b. a determination of the frequency that each piece of grinding and material handling equipment will be inspected to determine if additional control measures are needed. The identification of the record keeping form/record that will be used to track the inspection and reduction of fugitive emissions resulting from the

operation of each piece of grinding and material handling equipment. This form/record should include, at a minimum, the following elements:

- i. piece of equipment inspected;
 - ii. date inspected;
 - iii. name of employee responsible for the inspection;
 - iv. result of the inspection (needs treatment or does not need treatment);
 - v. an explanation of why no treatment was needed;
 - vi. date treated;
 - vii. name of employee responsible for treatment of the grinding and material handling equipment; and
 - viii. method used to reduce fugitive emissions associated with the operation of the grinding and material handling equipment.
- c. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Cleveland Division of Air Quality (Cleveland DAQ) for review and approval. The permittee can begin using the revised Work Practice Plan once the Cleveland DAQ has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of piece of grinding and material handling equipment at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for the grinding and material handling equipment that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

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

- a. the records required to be collected under the Work Practice Plan; and
- b. the date and reason any element of the Work Practice Plan was not implemented.

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the Cleveland DAQ.
- (2) The permittee shall submit annual deviation reports concerning any failure to implement the Work Practice Plan. These reports shall be submitted as part of the annual Permit Evaluation Report (PER).
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ 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.

f) Testing Requirements

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

a. Emission Limitation:

Visible emissions of fugitive dust shall not exceed twenty per cent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the visible fugitive dust opacity limitation for the grinding operation identified above shall be determined in accordance with USEPA test method 9 as set forth in 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) At the discretion and following the approval of the Cleveland DAQ, 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 (PT), providing the appropriate notification and exemption requirements have been met. The Cleveland DAQ 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 the permit;

- iii. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the Cleveland DAQ 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 meets 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 Cleveland DAQ 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 of OAC rule 3745-47, is published in the country 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 with a minimum of a 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 requirements above.

- (2) If 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 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.

- (3) The "Notice of Intent to Relocate a Portable Source" shall be submitted to the Cleveland DAQ. 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 or civil penalties.