



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

8/22/2016

Certified Mail

Jim Lind  
McKees Rocks Industrial Enterprises  
149 Nichol Avenue  
McKees Rocks, PA 15136

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0656005029  
Permit Number: P0120183  
Permit Type: Initial Installation  
County: Monroe

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**
- **What should you do if you notice a spill or environmental emergency?**

**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](http://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](http://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](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or 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-SEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
McKees Rocks Industrial Enterprises**

Facility ID:	0656005029
Permit Number:	P0120183
Permit Type:	Initial Installation
Issued:	8/22/2016
Effective:	8/22/2016
Expiration:	8/22/2026





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
McKees Rocks Industrial Enterprises

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**Final Permit-to-Install and Operate**  
McKees Rocks Industrial Enterprises  
**Permit Number:** P0120183  
**Facility ID:** 0656005029  
**Effective Date:** 8/22/2016

## Authorization

Facility ID: 0656005029  
Application Number(s): A0055138  
Permit Number: P0120183  
Permit Description: Initial installation permit for an existing silica sand transloading facility with associated roadways and storage piles  
Permit Type: Initial Installation  
Permit Fee: \$3,300.00  
Issue Date: 8/22/2016  
Effective Date: 8/22/2016  
Expiration Date: 8/22/2026  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

McKees Rocks Industrial Enterprises  
42722 State Route #7  
Hannibal, OH 43931

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, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install and Operate**  
McKees Rocks Industrial Enterprises  
**Permit Number:** P0120183  
**Facility ID:** 0656005029  
**Effective Date:** 8/22/2016

## Authorization (continued)

Permit Number: P0120183

Permit Description: Initial installation permit for an existing silica sand transloading facility with associated roadways and storage piles

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

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	F001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Storage Piles
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	P901
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
McKees Rocks Industrial Enterprises  
**Permit Number:** P0120183  
**Facility ID:** 0656005029  
**Effective Date:** 8/22/2016

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
McKees Rocks Industrial Enterprises  
**Permit Number:** P0120183  
**Facility ID:** 0656005029  
**Effective Date:** 8/22/2016

## **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.



**Final Permit-to-Install and Operate**  
McKees Rocks Industrial Enterprises  
**Permit Number:** P0120183  
**Facility ID:** 0656005029  
**Effective Date:** 8/22/2016

## **C. Emissions Unit Terms and Conditions**

**1. F001, Plant Roadways**

**Operations, Property and/or Equipment Description:**

Plant Roadways (Paved Roadways and Parking)

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. b)(1)b.

(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) June 30, 2008	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.  See b)(2)a.
b.	OAC Rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC Rule 3745-31-05(A)(3) do not apply to the PM <sub>10</sub> emissions from this air contaminant source since the potential to emit is less than 10 tons per year.  See b)(2)b. below.
c.	OAC Rule 3745-17-07(B)(4)	No visible particulate emissions from any paved roadway except for a period of time not to exceed 6 minutes during any 60-minute observation period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC Rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.  See b)(2)c.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The permittee shall employ reasonably available control measures to minimize or eliminate visible PE of fugitive dust by:
  - i. The periodic application of asphalt, oil (excluding any used oil as defined in paragraph (A)(12) of rule 3745-279-01 of the Administrative Code), water or other suitable dust suppression chemicals on gravel roads and parking lots.
  - ii. The prompt removal, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
  - iii. Requiring open-bodied vehicles transporting materials likely to become airborne to have such materials covered at all times if the control measure is necessary for the materials being transported.

c) Operational Restrictions

- (1) None.

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 paved and unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each roadway or parking area, or segment of roadway or parking area, for which the plan applies. The permittee can select whether to develop a plan based on segments or entire roads.
- b. A determination of the frequency that each roadway, parking area or segment will be inspected to determine if additional control measures are needed. The frequency of inspection can either be common for all segments of the roadway or parking areas or may be identified separately for various segments of the roadway or parking areas.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:
  - i. Roadway, parking area, or segment inspected;
  - ii. Date inspected;
  - iii. Name of employee responsible for inspection
  - iv. Result of the inspection (needs treated or does not need treated);
  - v. A description of why no treatment was needed;
  - vi. Date treated;
  - vii. Name of employee responsible for roadway, parking area, or segment treatment; and
  - viii. Method used to treat the roadway, parking area, or segment.
- 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 appropriate District Office or Local Air Agency (DO/LAA) for review and approval. The permittee can begin using the revised Work Practice Plan once the appropriate DO/LAA 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 roadway segments and parking 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 traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be

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

(3) Work Practice Plan Record Keeping

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.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part A of this permit.

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 appropriate DO/LAA.
- (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 Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

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. Emission Limitation:

There shall be no visible emissions of fugitive dust from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any sixty-minute observation period.



**Final Permit-to-Install and Operate**  
McKees Rocks Industrial Enterprises  
**Permit Number:** P0120183  
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Applicable Compliance Method:

If required, compliance with the applicable visible PE limitation listed 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"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

- g) Miscellaneous Requirements
  - (1) None.

**2. P901, Material Handling**

**Operations, Property and/or Equipment Description:**

Material Handling (Conveying, Loading/Unloading, Transfer Points)

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. c)(1), d)(1), and e)(2)a.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	Emissions of particulate matter 10 microns or less (PM <sub>10</sub> ) shall not exceed 1.53 tons per month averaged over a 12-month rolling period.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC Rule 3745-17-07(B)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20 percent opacity as a three-minute average.
e.	OAC Rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust  See b)(2)a. through b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-11(B)	PE shall not exceed 47.5 pounds per hour.  See b)(2)e.

(2) Additional Terms and Conditions

- a. The material handling operation(s) that are covered by this permit are listed below:

unloading from truck and railcar, transfer from hopper to conveyor, conveying and conveyor transfer points; and truck and railcar loading.

- b. The permittee shall employ reasonably available control measures for the above-identified material handling 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 Handling Operation(s)

Control Measures

Unloading railcar and truck to conveyor, conveying, and conveyor transfer points

Minimize drops, covered conveyors or covered conveyors equipped with a 99% efficiency filter, complete enclosures for truck unloading

Truck loading and rail car loading

Minimize drop heights

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

- c. For each material handling 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 handling 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 3745-17-08.
- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The maximum throughput as determined by the amount loaded out of trucks shall not exceed 600,000 tons per year.
- (2) The permittee shall operate the filter at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the throughput (i.e. the amount of materials loaded out of trucks), in tons per month. For each month, the permittee shall also calculate the annual, year-to-date, amount processed (cumulative total of each month to date from January thru December).
- (2) The permittee shall maintain daily records that document any time periods when the filter was not in service when the emissions unit was in operation.
- (3) Except as otherwise provided in this section and for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such unloading stations with the following frequencies:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
Unloading railcar and truck to conveyor, conveying, conveyor transfer points	Once per day on any day the material handling operation is in use
Truck loading	Once per day on any day the material handling operation is in use
Railcar loading	Once per day on any day the material handling operation is in use

- (4) The above-mentioned inspections shall be performed during representative, normal operating conditions.
- (5) 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 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.

- (6) The information in (5)d. shall be kept separately for (i) the unloading stations, (ii) the loading stations, (iii) the conveyors (iv) the transfer points, and (v) the material handling operations, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
- (7) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (8) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

- (2) The permittee shall submit Annual Permit Evaluation Reports (PER) that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:  
  
The maximum throughput as determined by the amount loaded out of trucks in c)(1).
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).
- (3) The permittee shall submit Annual Permit Evaluation Reports (PER) that identify:
- a. each day during which an inspection was not performed by the required frequency;
  - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented;
  - c. any exceedances of the annual throughput restriction for truck unloading, as well as corrective actions that were taken to achieve compliance; and
  - d. any time during which the filter was not in service when the emissions unit was in operation.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(7) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

f) **Testing Requirements**

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

a. Emissions Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

b. 1.53 tons of PM<sub>10</sub> per month averaged over a rolling, 12-month rolling period.

18.27 tons of PM<sub>10</sub> per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance with the tons per month averaged over a rolling, 12-month period limitation shall be determined by the sum of the following calculations:

i. Railcar Unloading

For the emissions from the material unloaded from railcars, multiply the emission factor equation (1) in Section 13.2.4, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for railcar unloading (PM<sub>10</sub> 0.037 lb/ton) by the maximum number of tons of silica sand unloaded (600,000 tons/yr) and multiply by one minus the control efficiency (1-0.25) to account for minimized drop heights and divide by 2,000 pounds per ton and divide by 12 months/year.

ii. Conveying

For the emissions from the material conveying, multiply the emission factor equation (1) in Section 13.2.4, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for railcar unloading (PM<sub>10</sub> 0.037 lb/ton) by the maximum number of tons of silica sand unloaded (600,000 tons/yr) and multiply by one minus the control efficiency dry filtration control efficiency (1-0.99) to account for an enclosed conveyor with a fabric filter and divide by 2,000 pounds per ton and divide by 12 months/year.

iii. Material Transfer from Conveyor to a Dump Truck for Storage Pile Placement

For the emissions from the material transfer from a conveyor to a truck for storage pile placement, multiply the emission factor equation (1) in

Section 13.2.4, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for material conveying (PM<sub>10</sub> 0.037 lb/ton) by the maximum number of tons of silica sand unloaded (600,000 tons/yr) and multiply by one minus the control efficiency (1-0.7) to account for an enclosed transfer point and divide by 2,000 pounds per ton and divide by 12 months/year.

iv. Front End Loader Transfer from Storage Pile to Conveying for Truck Loading

For the emissions from conveying material from a storage pile to conveying for truck loading, multiply the emission factor equation (1) in Section 13.2.4, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for truck loading (PM<sub>10</sub> 0.037 lb/ton) by the maximum number of tons of silica sand unloaded (600,000 tons/yr) and multiply by one minus the control efficiency (1-0.7) to account for material transfer to a conveyor in an enclosure and divide by 2,000 pounds per ton and divide by 12 months/year.

v. Truck Loading

For the emissions from the conveyor to the dump truck, multiply the emission factor equation (1) in Section 13.2.4, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for railcar unloading (PM<sub>10</sub> 0.037 lb/ton) by the maximum number of tons of silica sand unloaded (600,000 tons/yr) and multiply by one minus the control efficiency (1-0.70) to account for minimized drop heights and divide by 2,000 pounds per ton and divide by 12 months/year.

The annual emissions of PM<sub>10</sub> may be calculated as the sum of the emissions from the tons per month averaged over a 12-month rolling period for railcar unloading, truck unloading, conveying/transferring, and truck loading and multiplying by 12 months/year.

c. Emission Limitation:

Particulate emissions shall not exceed 47.5 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.

**3. F003, Storage Piles**

**Operations, Property and/or Equipment Description:**

Storage Piles (Load-In/Out, Wind Erosion, and Vehicle Traffic)

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. b)(1)b.

(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) June 30, 2008	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.  See b)(2)a.
b.	OAC Rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM <sub>10</sub> emissions from this air contaminant source since the potential to emit is less than 10 tons/year.  See b)(2)b.
c.	OAC Rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from front-end loader traffic on paved areas, except for a period of time not to exceed six minutes during any



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		sixty-minute observation period.
d.	OAC Rule 3745-17-07(B)(6)	There shall be no visible particulate emissions from any material storage pile, except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
e.	OAC Rule 3745-17-08(B)	Utilize reasonably available control measures to prevent fugitive dust from becoming airborne.  See b)(2)c. through b)(2)h.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. 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 permittee's permit application, the permittee has committed to locate the storage piles inside a four-sided enclosure for receiving, storing and transferring sand for loading.
- d. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile.
- f. The permittee shall employ reasonably available control measures for loader traffic around the storage piles for the purpose of minimizing or eliminating visible emissions of fugitive dust. In accordance with the application, the permittee has committed to locate the storage piles inside a four-sided enclosure for receiving, storing and transferring sand for loading to minimize or eliminate visible emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to minimize or eliminate visible emissions of fugitive dust.

- g. The above-mentioned control measure(s) shall be employed for loader traffic around the storage piles.
  - h. 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 locate the storage piles inside a four-sided enclosure for receiving, storing and transferring sand for loading to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
  - i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available control requirements of OAC rule 3745-17-08.
- c) Operational Restrictions
- (1) None.
- 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. Transfer points from unloading process inspected;
  - ii. Date inspected;
  - iii. Name of employee who either did the inspection or who can verify that the inspection was completed;
  - iv. Result of the inspection (needs additional control or does not need additional control);
  - v. A description of why additional controls were needed;

- vi. Date additional controls were implemented;
  - vii. Name of employee responsible for implementing additional controls for the storage pile or storage pile area;
  - viii. Method used to treat the transfer point.
- 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 appropriate District Office or local air agency (DO/LAA) for review and approval. The permittee can begin using the revised Work Practice Plan once the appropriate DO/LAA 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 additional control measures. The inspections shall be performed during representative, normal storage pile operating conditions.

(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.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part I of this permit.

e) Reporting Requirements

(1) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number 3.b)(1)c., 3.b)(1)f., and 3.b)(1)h. above:

- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible emissions.

(2) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the appropriate DO/LAA.

- (3) 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).
  - (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- 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. Emissions Limitations:

There shall be no visible particulate emissions except for a period of time not to exceed thirteen minutes in any 60-minute observation period from load-in and load-out.

There shall be no visible particulate emissions except for a period of time not to exceed six minutes in any 60-minute observation period from front-end loader traffic on paved areas.

Applicable Compliance Method:

Compliance with the visible particulate emissions limitations 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") and the modifications specified in OAC rule 3745-17-03(B)(4).
- g) Miscellaneous Requirements
- (1) None.