

Facility ID: 1677940013 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1677940013 Emissions Unit ID: P901 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P901 - Portable Morbark Model 1300 Tub Grinder with an 860 horsepower diesel engine.	OAC rule 3745-31-05(A)(3)	15.75 pounds of particulate emissions (PE) per hour
		15.75 tons of PE per year
		Visible particulate emissions from the tub grinder, the processed mulch pile(s), conveyor transfer point(s), and the loading and unloading activities associated with the tub grinder shall not exceed 6 minutes during any 60 minute period.
		Emissions from the diesel engine shall not exceed the following rates:
		20.4 pounds of nitrogen oxides (NOx) per hour and 20.4 tons of NOx per year
		4.68 pounds of carbon monoxide (CO) per hour and 4.68 tons of CO per year
		3.44 pounds of sulfur dioxide (SO2) per hour and 3.44 tons of SO2 per year
		0.37 pound of PE per hour and 0.37 ton of PE per year
		0.6 pound of organic compounds (OC) per hour and 0.6 ton of OC per year
	OAC rule 3745-17-07(A)	Visible particulate emissions from the diesel engine exhaust stack shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-07(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(5)(b)	The particulate emissions from the diesel engine's exhaust shall not exceed 0.062 pound per million Btu of actual heat input.

OAC rule 3745-18-06(B)

Stationary internal combustion engines which have rated heat input capacities equal to, or less than, ten MM Btu per hour total rated capacity are exempt from paragraphs (D), (F), and (G) of OAC rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.

2. Additional Terms and Conditions

- (a) This facility shall not cause a nuisance per Ohio Administrative Code 3745-15-07. The permittee shall employ best available control measures for the tub grinder, the processed mulch pile(s), conveyor transfer point(s), and the loading and unloading activities associated with the tub grinder for the purpose of ensuring compliance with the "no visible emissions" requirement. The permittee shall employ water on an "as needed" basis to ensure compliance.

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

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 "no visible emissions" requirement. Any required implementation of the control measure(s) shall continue until further observation confirms that use of the control measure(s) is unnecessary.

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

The pounds per hour limit for PE for the tub grinder and the pounds per hour limits for PE, NO_x, CO, SO₂, and OC for the tub grinder's diesel engine reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits. The tons per year limit for PE for the tub grinder and the tons per year limits for PE, NO_x, Co, SO₂, OC for the tub grinder's diesel engine are based on the maximum pounds per hour multiplied by the maximum annual operating hours limitation. Therefore, the record keeping and/or reporting requirements for the annual operating hours limitation is sufficient to ensure compliance with these annual emission limits.

B. Operational Restrictions

1. This emissions unit shall be operated with diesel fuel with a sulfur content less than or equal to 0.5% by weight.

The maximum annual operating hours for this emissions unit shall not exceed 2000.

C. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

operation(s) minimum inspection frequency

tub grinder hourly

conveyor transfer point(s) hourly
loading and unloading activities hourly

associated with the tub grinder
processed mulch piles daily

2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall note the following in an operations log for each operation (i.e., tub grinder, processed mulch pile(s), conveyor transfer point(s), and the loading and unloading activities associated with the tub grinder) at the minimum inspection frequency specified above whenever the emissions unit is in operation:
- the date and time of each observation;
 - the presence or absence of any visible emissions;
 - whether it was determined by the permittee that it was necessary to implement the control measures;
 - the dates and times the control measures were implemented; and,
 - the name of the person reporting each observation.
5. The operations log shall be maintained on site.
6. The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit.
7. The permittee shall maintain monthly records of the operating hours for this emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any of the following occurrences:
- each day during which an inspection was not performed by the required frequency; and,

- b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
- 2. The permittee shall submit deviation (excursion) reports which identify each day when a fuel that does not meet the requirements of section B.1 of these terms and conditions was burned in this emissions unit.
- 3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
- 4. The permittee shall submit annual reports which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

Visible particulate emissions from the tub grinder, the processed mulch pile(s), conveyor transfer point(s), and the loading and unloading activities associated with the tub grinder shall not exceed 6 minutes during any 60 minute period.

Applicable Compliance Method:

Compliance with the emission limitation 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.

Emission Limitation:

2.8 pounds of PE per hour

Applicable Compliance Method:

Multiply the RACM emission factor of 0.35 pound of particulate emissions per ton of material processed (Ohio EPA RACM Table 2.17-1) by the maximum hourly process rate times (1-0.8*)

*The control efficiency for watering and for the moisture content of the material processed.

Emission Limitation:

20.4 pounds of NOx per hour

Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.024 pounds of NOx per horsepower-hour (AP-42 Table 3.4-1 dated 10/96) by the maximum power output.

Emission Limitation:

4.68 pounds of CO per hour

Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.0055 pound of CO per horsepower-hour (AP-42 Table 3.4-1 dated 10/96) by the maximum power output.

Emission Limitation:

3.44 pounds of SO2 per hour

Applicable Compliance Method:

Multiply the AP-42 derived emission factor of 0.004045 pound of SO2 per horsepower-hour (AP-42 Table 3.4-1 dated 10/96) by the maximum power output.

Emission Limitation:

0.37 pound of PE per hour

Applicable Compliance Method:

Multiply the allowable emission limit of 0.062 pound of PE per million Btu of actual fuel input by 7000 Btu/horsepower-hour times 1 MM Btu/ 1 x 10⁶ Btu times the maximum power output.

Emission Limitation:

0.6 pound of OC per hour

Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.000705 pound of OC per horsepower-hour (AP-42 Table 3.4-1 dated 10/96) by the maximum power output.

Emission Limitations:

2.8 tons of PE per year
20.4 tons of NOx per year
4.68 tons of CO per year
3.44 tons of SO2 per year
0.37 ton of PE per year
0.6 ton of OC per year

Applicable Compliance Method:

Multiply the allowable hourly emissions limitation by 2000 hours per year, then divide by 2000 pounds per ton.
Emission Limitation:

Visible particulate emissions from the diesel engine exhaust stack shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)
Emission Limitation:

The particulate emissions from the diesel engine's exhaust shall not exceed 0.062 pound per million Btu of actual heat input.

Applicable Compliance Method:

If required, compliance with the allowable emission limitation shall be determined in accordance with test method(s) and procedures specified in OAC rule 3745-17-03(B)(10).

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable emissions unit shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:
 - a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
 - i. the portable emissions unit is equipped with the best available technology for such portable emissions unit;
 - ii. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO) or registration status;
 - iii. the applicant has provided proper notice of intent to relocate the portable emissions unit to Akron Regional Air Quality Management District (ARAQMD) and the appropriate field office having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and
 - iv. in ARAQMD's and the appropriate field office's (having jurisdiction over the new site) judgement, the proposed site is acceptable under OAC rule 3745-15-07.
2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable emissions unit may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:
 - i. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
 - ii. the portable emissions unit is equipped with best available technology;
 - iii. the portable emissions unit owner has identified the proposed site to Ohio EPA;
 - iv. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
 - vi. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to this proposed site; and
 - vii. the portable emissions unit owner has provided Ohio EPA with 15 days written notice of the relocation.
3. Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

In order for ARAQMD and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable emissions unit must file a " Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with ARAQMD and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, ARAQMD, and/or appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.