



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

9/23/2008

Mike Moeller
Ohio Mulch Supply Inc.
1600 UNIVERSAL RD
Columbus, OH 43207

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125042476
Permit Number: P0083310
Permit Type: Renewal
County: Franklin

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate 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 comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. 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
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 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 in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate 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 and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-CDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Ohio Mulch Supply Inc.

Issue Date: 9/23/2008
Permit Number: P0083310
Permit Type: Renewal
Permit Description: Power screen with diesel engine, storage piles and material handling operations
Facility ID: 0125042476
Facility Location: Ohio Mulch Supply Inc.
2140 Advance Ave,
Columbus, OH 43207
Facility Description: All Other Miscellaneous Wood Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to John Kirwin at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This legacy renewal is for a power screen (F002) with a diesel engine restricted at 1,000 operating hours, and fugitive PM emissions from material handling (F003) and roadways (F005).

3. Facility Emissions and Attainment Status:

Ohio Mulch reported 1.0 ton SO₂, 5.5 tons NO_x, 2.1 tons OC , and 42.52 tons PM for 2007 at the Advance Avenue facility. Franklin County has been designated as non-attainment for ozone and PM_{2.5}

4. Source Emissions:

Pollutant	F003 (tons/yr)	F002 (tons/yr)	F005 (tons/yr)	Total (tons/yr)
NO _x		3.4		3.4
CO		0.7		0.7
PE	10	20.2	29.5	59.7
OC		0.3		0.3
SO ₂		0.2		0.2

5. Conclusion:

The restricted facility emissions would not exceed the threshold for Title V permitting.

6. Please provide additional notes or comments as necessary:

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant

Tons Per Year

PE

59.7



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0083310
Facility ID: 0125042476

NOx	3.4
OC	0.3
CO	0.7
SO2	0.2



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install and Operate
for
Ohio Mulch Supply Inc.**

Facility ID: 0125042476
Permit Number: P0083310
Permit Type: Renewal
Issued: 9/23/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Ohio Mulch Supply Inc.

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Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0083310

Facility ID: 0125042476

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125042476

Application Number(s): A0013673

Permit Number: P0083310

Permit Description: Power screen with diesel engine, storage piles and material handling operations

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 9/23/2008

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:

Ohio Mulch Supply Inc.
2140 Advance Ave
Columbus, OH 43207

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0083310

Facility ID: 0125042476

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0083310

Permit Description: Power screen with diesel engine, storage piles and material handling operations

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:	Primary and secondary soil grinding
Superseded Permit Number:	01-08446
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	Material Handling
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F005
Company Equipment ID:	Paved Roadways
Superseded Permit Number:	01-08753
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0083310

Facility ID: 0125042476

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 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 Ohio EPA DAPC, Central District Office 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0083310

Facility ID: 0125042476

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0083310

Facility ID: 0125042476

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0083310

Facility ID: 0125042476

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) 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0083310

Facility ID: 0125042476

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F002, Primary and secondary soil grinding

Operations, Property and/or Equipment Description:

Power screens (200 tons/hr)

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 operations(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. 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
	Primary and secondary power screens (200 tons/hr)	
a.	OAC rule 3745-31-05(A)(3) (PTI 01-08446)	Fugitive PE shall not exceed 20 pounds per hour. See (2)b through (2)d below. Compliance with this rule also includes compliance with OAC rules 3745-17-07(B)(1) and 3745-17-08(B).
b.	OAC rule 3745-17-07 (B)(1)	See (2)a below.
c.	OAC rule 3745-17-08 (B), (B)(6)	See (2)f and (2)h below.
d.	OAC rule 3745-31-05(D) (PTI 01-08446)	Fugitive PE shall not exceed 10 tons per rolling 12-month period. See c(1) below.
	145 hp and 70 hp diesel engines	
e.	OAC rule 3745-31-05(A)(3) (PTI 01-08446)	NOx emissions shall not exceed 6.67 lbs/hr; CO emissions shall not exceed 1.45



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>lbs/hr;</p> <p>SOx emissions shall not exceed 0.44 lbs/hr;</p> <p>OC emissions shall not exceed 0.53 lb/hr.</p> <p>PE shall not exceed 0.5 lb/hr.</p> <p>See sections A.2.e and c)(1) below.</p> <p>Compliance with this rule also includes compliance with OAC rules 3745-17-11(B)(5), 3745-17-07(A) and 3745-18-06(G).</p>
f.	OAC rule 3745-31-05(D) (PTI 01-08446)	<p>NOx emissions shall not exceed 3.35 tons per rolling 12-month period;</p> <p>CO emissions shall not exceed 0.73 ton per rolling 12-month period;</p> <p>SOx emissions shall not exceed 0.22 ton per rolling 12-month period;</p> <p>OC emissions shall not exceed 0.27 ton per rolling 12-month period.</p> <p>PE shall not exceed 0.24 ton per rolling 12-month period.</p> <p>See c(1) below.</p>
g.	OAC rule 3745-17-07 (A)(1)(a)	See (2)i below.
h.	OAC rule 3745-17-11 (B)(5)	See (2)j below.
i.	OAC rule 3745-18-06(G)	See (2)k below.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity, as a three-minute average, as determined in accordance with paragraph (B)(3) of OAC rule 3745-17-03.
- b. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
- c. The material handling operation that is covered by this permit and subject to the above-mentioned requirements are listed below:



Soil Grinder

- d. The permittee shall employ best available control measures for the above-identified material handling operation 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 to ensure compliance:

material handling operation	control measure
-----------------------------	-----------------

Power screens	Moisture, inherent
---------------	--------------------

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

- e. For each material handling operation that is not adequately enclosed, the above-identified control measures 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 is necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure is unnecessary.
- 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 rules 3745-17-08 and 3745-31-05.
- g. The hourly combustion emissions of NO_x, SO₂, CO, OC and PE 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.
- h. The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- i. Visible PE from the diesel engine exhaust stack shall not exceed 20% opacity as a 6 minute average, except as provided by rule.
- j. PE from the diesel engine exhaust stack shall not exceed 0.310 lb per MMBTU of actual heat.
- k. SO₂ emissions from the diesel engine exhaust stack shall not exceed 0.5 lb per MMBTU of actual heat input.

c) Operational Restrictions

- (1) The maximum annual operating hours for power screens shall not exceed 1,000 hours per rolling, 12- month period.
- (2) The engines shall be operated with diesel fuel with a sulfur content less than 0.5% by weight.



d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections to determine if visible particulate emissions are being emitted from the operations listed below in accordance with the following minimum frequencies:

<u>operation</u>	<u>minimum inspection frequency</u>
Power screen	Daily, when operating

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

The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the "no visible emissions" requirement..

- (2) The permittee shall note the following in an operations log for each operation (soil grinder) at the minimum inspection frequency specified above whenever the emissions unit is in operation:
 - a. the date and time of each observation;
 - b. the presence or absence of any visible emissions;
 - c. whether it was determined by the permittee that it was necessary to implement the control measures;
 - d. the dates and times the control measures were implemented; and
 - e. the name of the person reporting each observation.
- (3) The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit.
- (4) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month summation of the operating hours.
- (5) The operations log shall be maintained on site.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)].

- (2) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels.
- (3) The permittee shall submit a deviation report for each day when a fuel other than 0.5% sulfur diesel fuel was burned in this emissions unit. This report shall be submitted within 30 days after the deviation occurred

f) Testing Requirements

- (1) Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Fugitive PE shall not exceed 20 lbs/hr and 10 tons/yr from the power screen.

Applicable Compliance Method:

Compliance shall be based on an emission factor of 0.1 lb PM/ton soil times the maximum annual production rate of 200,000 tons/yr divided by 2,000 pounds per ton to equal 10 tons PE/yr. The hourly rate is based on the annual emission rate times 2000 lbs per ton divided by the maximum operating hours of 1,000 hr per year to equal 20 lbs.

b. Emissions Limitation:

Combustion emissions shall not exceed the following: NOx emissions shall not exceed 6.67 lbs/hr per hour and 3.35 tons/yr; CO emissions shall not exceed 1.45 lb/hr and 0.73 ton/yr; SOX emissions shall not exceed 0.44 lb/hr and 0.22 ton/yr; OC emissions shall not exceed 0.53 lb/hr and 0.27 tons/y and PE shall not exceed 0.5 lb/hr and 0.24 ton/yr.

Applicable Compliance Method:

Compliance with the emission limitations identified above for the diesel engines shall be determined by using the emission factors from AP-42, 5th Edition (October 1996), Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines" and the rated capacity of the diesel engines (145 hp/70 hp). The hourly emission rates are multiplied by 1,000 hours and converted to tons to obtain the annual emissions.

AP-42 Table 3.3-1

$$0.031 \text{ lb NOx/hp-hr} * 145 \text{ hp} = 4.5 \text{ lb NOx/hr} * 1,000 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs} = 2.25 \text{ tons NOx/yr}$$

$$0.00668 \text{ lb CO/hp-hr} * 145 \text{ hp} = 0.98 \text{ lb CO/hr} * 1,000 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs} = 0.49 \text{ ton CO/yr}$$



$0.00205 \text{ lb SOx/hp-hr} * 145 \text{ hp} = 0.30 \text{ lb SOx/hr} * 1,000 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs} = 0.15 \text{ ton SOx/yr}$

$0.00247 \text{ lb OC/hp-hr} * 145 \text{ hp} = 0.36 \text{ lb OC/hr} * 1,000 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs} = 0.18 \text{ ton OC/yr}$

$0.0022 \text{ lb PE/hp-hr} * 145 \text{ hp} = 0.32 \text{ lb PE/hr} * 1,000 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lb} = 0.16 \text{ ton PE/yr}$

AP-42 Table 3.3-1

$0.031 \text{ lb NOx/hp-hr} * 70 \text{ hp} = 2.17 \text{ lb NOx/hr} * 1,000 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lb} = 1.1 \text{ tons NOx/yr}$

$0.00668 \text{ lb CO/hp-hr} * 70 \text{ hp} = 0.47 \text{ lb CO/hr} * 1,000 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lb} = 0.24 \text{ ton CO/yr}$

$0.00205 \text{ lb SOx/hp-hr} * 70 \text{ hp} = 0.14 \text{ lb SOx/hr} * 1,000 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lb} = 0.07 \text{ ton SOx/yr}$

$0.00247 \text{ lb OC/hp-hr} * 70 \text{ hp} = 0.17 \text{ lb OC/hr} * 1,000 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lb} = 0.09 \text{ ton OC/yr}$

$0.0022 \text{ lb PE/hp-hr} * 70 \text{ hp} = 0.15 \text{ lb PE/hr} * 1,000 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lb} = 0.08 \text{ ton PE/yr.}$

c. Emission Limitation:

Visible PE from the diesel engine exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emissions Limitation:

PE emissions from a small bore diesel engine exhaust stack shall not exceed 0.310 lb per MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with the emissions limitation for the diesel engine identified above shall be determined by using the emission factor for particulates from AP-42, 5th Edition (October 1996), Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines." This emission factor is 0.31 lb particulate/MMBtu (fuel input) for diesel fuel. (Note: this emission factor is equivalent to the emission factor of 0.0022 lb PM/hp-hr).Emissions Limitation:

e. Emissions Limitation:

SO2 emissions from the diesel engine exhaust stack shall not exceed 0.5 lb per MMBTU of actual heat input.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0083310

Facility ID: 0125042476

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Applicable Compliance Method:

Compliance with the emissions limitation for the diesel engine identified above shall be determined by using the emission factor for SO_x from AP-42, 5th Edition (October 1996), Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines." This emission factor is 0.29 lb SO_x/MMBtu (fuel input) for diesel fuel.

g) Miscellaneous Requirements

- (1) None.



2. F003, Material Handling

Operations, Property and/or Equipment Description:

Material handling with load in and load-out from storage piles and wind erosion

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 operations(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. 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) (PTI 01-08446)	PE emissions shall not exceed 10 tons/yr. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See (2)a through (2)f below.
b.	OAC rule 3745-17-07 (B)(6)	See (2)g below.
c.	OAC rule 3745-17-08 (B), (B)(6)	See (2)g below.

(2) Additional Terms and Conditions

a. There shall be no visible particulate emissions (PE) except for a period of time not to exceed 1 minute during any 60 minute observation period from material handling operations and storage piles.

b. All mulch and soil storage piles are covered by this permit and subject to the above-mentioned requirements.



- c. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ inherent moisture 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 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 are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure shall continue during any such operation until further observation confirms that use of the measure is unnecessary.
- e. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ inherent moisture to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The above-mentioned control measure 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 are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure 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.

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 rules 3745-17-08 and 3745-31-05.

- g. The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) Water sprays shall be operated at points necessary to ensure compliance with the visible emission limitations specified above.

d) Monitoring and/or Recordkeeping Requirements

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

storage pile identification	minimum load-in inspection frequency
Mulch piles	Daily, when operating



days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

- (5) The information required in (4)d shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)].

f) Testing Requirements

- (1) Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PE shall not exceed 2.3 lbs/hr and 10 tons/yr from material handling and wind erosion from storage piles.

Applicable Compliance Method:

Compliance shall be determined by the summing the calculated emission for material handling of mulch and with those emissions resulting from stockpiling of mulch and soils using the following equations:

Mulch handling and stockpiling

Emission factors for sawdust pile loading, unloading and storage piles RACM Table 2.17-1

$$E = 1.0 \text{ lb PM/ton} * 7.7 \text{ tons mulch/hr} * (1 - 0.8) = 1.54 \text{ lbs PE/hr}$$

$$1.54 \text{ lbs/hr} * 8,760 \text{ hrs/yr} * 1 \text{ ton}/2,000 \text{ lbs} = 6.75 \text{ tons PE/yr}$$

Soil handling and stockpiling

Emission calculation for soils handling and storage piles RACM Section 2.1.2., Equation 1

$$EF \text{ (lb/ton)} = 0.33 / (PE/100)^2$$

$$0.33 / (101/100)^2 = 0.34 \text{ lb/ton}$$



$$0.34 \text{ lb/ton} * 19,170 \text{ tons/yr} * 1 \text{ ton}/2,000 \text{ lbs} = 3.26 \text{ tons/yr}$$

$$(3.26 \text{ tons/yr} * 2,000 \text{ lbs/ton})/8,760 \text{ hrs/yr} = 0.74 \text{ lbs/hr}$$

$$1.54 \text{ lbs/hr} + 0.74 \text{ lb/hr} = 2.3 \text{ lbs PM/hr}$$

$$6.75 \text{ tons/yr} + 3.26 \text{ tons/yr} = 10 \text{ tons PM/yr}$$

b. Emission limitation:

There shall be no visible particulate emissions except for a period of time not to exceed 1 minute during any 60-minute observation period from material handling operations and storage piles.

Applicable Compliance Method:

Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.



3. F005, Paved Roadways

Operations, Property and/or Equipment Description:

Paved roadways and working pads

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 operations(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. 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) (PTI 01-08753)	Particulate emissions (PE) shall not exceed 29.5 tons per year. Best available control measures shall be sufficient to minimize or eliminate visible emissions of fugitive dust. See (2)a and (2)c through (2)h below
b.	OAC rule 3745-17-07(B)(4)	See (2)b below.
c.	OAC rule 3745-17-08(B)	See (2)b below.

(2) Additional Terms and Conditions

a. There shall be no visible particulate emissions except for a period of 1 minute during any 60 minute observation period from a paved roadway.

b. The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).



- c. The paved roadways and staging areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways:

Facility entrance and exit

paved staging areas:

All

- d. The permittee shall employ best available control measures on all paved roadways and staging areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee has committed to treat the paved roadways and parking areas by employing good housekeeping practices and sweeping and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- f. The permittee shall promptly remove, 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.
- g. Open-bodied vehicles owned by the permittee and transporting materials likely to become airborne shall have such materials covered at all times, if the control measure is necessary for the materials being transported.
- h. 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.

c) Operational Restrictions

- (1) A maximum speed limit of 10 miles per hour for vehicular traffic shall be posted and enforced on the roadways and staging areas of this facility.
- (2) The permittee shall comply with storm water control regulations in the application of water dust suppressants. In areas outside of the storm water retention pond drainage catch, the permittee may employ sweeping, vacuum sweeping or alternative control measures.



d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

paved roadways and staging areas	minimum inspection frequency
All roadways	daily
All pads	daily

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or staging 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 may, upon receipt of written approval from the Ohio EPA Central District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in (4) d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)].

f) 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):

a. Emission Limitation:

Particulate emissions shall not exceed 29.5 ton per year from paved roadways.

Applicable Compliance Method:

Compliance shall be determined by the following calculations:

Paved entrance roadway and staging areas - AP-42 emission factor section 13.2.1

$$E = k(sL/2)^{0.65} (W/3)^{1.5} \text{ lbs/VMT}$$

k = particle size multiplier = 0.082 lb/VMT (PM-30 Table 13.2.1-1 AP-42)

sL = silt loading on road surface = 7.4 gm/m² (Table 13.2.1-2)

W = average vehicle weight (tons) = 12 (semi-empty); 20 (semi-full)

Annual vehicle miles traveled = 15,541 VMT/yr

$$E = 0.082(7.4/2)^{0.65} (12/3)^{1.5} = 0.082 * 2.34 * 8 = 1.54 \text{ lbs/VMT (semi-empty)}$$

$$E = 0.082(12/2)^{0.65} (20/3)^{1.5} = 0.082 * 3.2 * 17.2 = 4.52 \text{ lbs/VMT (semi-full)}$$

$$E \text{ (average)} = (1.54 \text{ lbs/VMT (semi-empty)} + 4.52 \text{ lbs/VMT (semi-full)})/2 = 3.8 \text{ lbs/VMT}$$

$$\text{tons PM}_{30}/\text{yr} = 3.8 \text{ lbs PM}_{30}/\text{VMT} * (15,541 \text{ miles/yr}) * 1 \text{ ton}/2,000 \text{ lb} = 29.5 \text{ tons PM/yr}$$

b. Emission limitation:

There shall be no visible emissions except for a period not to exceed 1 minute during any 60 minute observation period from paved roadways.

Applicable Compliance Method:

Compliance with the emission limitation for the paved roadways and parking areas 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.



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g) Miscellaneous Requirements

(1) None.