



State of Ohio Environmental Protection Agency

**Hamilton County**

**RE: Final Permit to Install**

Street  
1800 \  
Column

address:

16-1049

Application No: **14-4722**

DATE: **July 8, 1999**

**Morrow Gravel Co. Plant 0327  
Dan Crago  
11641 Mosteller Road  
Cincinnati, Ohio 45241**

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

**Hamilton Co. Dept of Env. Services**



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Application Number: 14-4722

Permit  
Title

APS Premise Number: 1431403186

Permit Fee: **\$1100**

Name of Facility: Morrow Gravel Co. Plant 0327

Person to Contact: Dan Crago

Address: 11641 Mosteller Road  
Cincinnati, Ohio 45241

Location of proposed air contaminant source(s) [emissions unit(s)]:

**11641 Mosteller Road  
Cincinnati, Ohio**

Description of proposed emissions unit(s):

**RECYCLED ASPHALT PROCESSING PLANT, ROADWAYS, AND CRUSHED ASPHALT STORAGE PILES.**

Date of Issuance: July 8, 1999

Effective Date:

July 8, 1999

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### **10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### **11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

#### **12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	4.05
PM <sub>10</sub>	1.77

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Limitations/Control Measures</u>	<u>Emissions</u>
Portable Recycled Asphalt Processing Plant	OAC rule 3745-31-05	0.57 lb PM/hr, 0.43 TPY PM 0.28 lb PM <sub>10</sub> /hr, 0.21 TPY PM <sub>10</sub> See terms B.1. and B.2.	
	OAC rule 3745-15-07	See Part I, term A.7.	
	40 CFR Part 60 Subpart OOO	See terms A.2.2.b., A.2.2.c., A.2.2.d. and A.2.2.e.	
	OAC rule 3745-17-08(B)	See term B.3.	
	OAC rule 3745-17-07(B)	Less stringent than 40 CFR Part 60 Subpart OOO.	

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of water sprays to keep the material moist, as necessary to meet the opacity limitations.
- 2.b Fugitive particulate emissions from any transfer point on belt conveyors and from any other emissions point (excluding crushers and truck dumping) where process materials are not saturated, shall not exceed 10 percent opacity, except as provided by rule 40 CFR 60.672.
- 2.c Fugitive particulate emissions from any crusher shall not exceed 15 percent opacity.

- 2.d Fugitive particulate emissions from wet screening operations and subsequent screening operations, bucket elevators, and belt conveyors that process saturated material in the production line up to the next crusher, grinding mill or storage bin shall not exceed 0 percent opacity.

- 2.e Fugitive particulate emissions from screening operations, bucket elevators, and belt conveyors in the production line downstream of wet mining operations, where such screening operations, bucket elevators, and belt conveyors process saturated materials up to the first crusher, grinding mill, or storage bin in the production line shall not exceed 0 percent opacity.
- 2.f The hourly emission limitations outlined above are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

- 1. Water sprays shall be operated at points necessary to ensure compliance with the visible emission limitations specified in section A.2.2.b, A.2.2.c, A.2.2.d and A.2.2.e for crushing, transfer points, screening, and conveying operations.
- 2. Recycled asphalt product loaded onto trucks shall have a moisture content sufficient to minimize visible emissions of fugitive dust and the loading drop height shall not exceed fifteen (15) feet.
- 3. The permittee shall take all steps necessary to ensure the product maintains sufficient moisture, so as to minimize or eliminate the visible emissions of fugitive dust.
- 4. The maximum production rate for this emissions unit shall not exceed 200 tons of recycled asphalt per hour and 300,000 tons of recycled asphalt per year.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall maintain monthly records of the amount of recycled asphalt processed in emissions unit F014.

**D. Reporting Requirements**

- 1. The permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards in 40 CFR 60.672 of Subpart OOO, including reports of observations using Method 9 to demonstrate compliance with section A.2.2.b and A.2.2.c of this permit.
- 2. A screening operation, bucket elevator, or belt conveyor that processes saturated material and is subject to 40 CFR 60.672(h) and subsequently processes unsaturated material shall submit a report of this change within 30 days following such change to the Hamilton County Department

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of Environmental Services. This screening operation, bucket elevator, or belt conveyor is then subject

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to the 10 percent opacity limit in 40 CFR 60.672(b) and the emission test requirements of 40 CFR 60.11 and 60.675. A screening operation, bucket elevator, or belt conveyor that processes unsaturated material but subsequently processes saturated material shall submit a report of this change within 30 days following such change. This screening operation, bucket elevator, or belt conveyor is then subject to the no visible emission limit in 40 CFR 60.672(h).

3. The permittee shall submit a notification of the actual date of initial startup of the emissions units to Hamilton County Department of Environmental Services. The notification shall be postmarked within 15 days after the startup date and shall include a description of each affected emissions unit, equipment manufacturer, and serial number of the equipment if available.
4. These reports, as denoted in section D.1, D.2 and D.3 are due by the date described in Part 1 - General Terms and Conditions of the permit.
5. The permittee shall submit annual reports which specify the total PM emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit annual reports which identify any exceedances of the annual production rate 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. The permittee shall conduct, or have conducted, fugitive particulate emission testing for emissions unit F014 in accordance with the following requirements:
  - a. The emission testing shall be conducted within 60 days after achieving maximum production but no later than 180 days after initial startup.
  - b. The emission testing shall be conducted to demonstrate compliance with 40 CFR 60 Subpart OOO;
  - c. Compliance with the opacity limits of this permit shall be determined by using US EPA Reference Test Method 9. The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency;

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Facility ID: 1431403186

Emissions Unit ID: **F014**

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency.

The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

2. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined by using the emissions factors from AP-42, Table 11.19.2-2 (Revised 1/95) Emission Factors for Crushed Stone Processing Operations.
3. Compliance with the fugitive visible particulate emissions limit shall be demonstrated by the methods outlined in OAC rule 3745-17-03(B)(3).
4. Compliance with the production rate limit in term B.4. shall be demonstrated by the recordkeeping in term C.1.

**F. Miscellaneous Requirements**

1. The permittee shall comply with all applicable miscellaneous requirements of 40 CFR 60, Subpart OOO.
2. Notice to Relocate a Portable or Mobile Source

Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:

- a. The portable emissions unit is equipped with the best available control technology for such portable emissions unit;

- b. The portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);

- c. The applicant has provided proper notice of intent to relocate the portable emissions unit to the Hamilton County DES and the appropriate field office having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and,
- d. In Hamilton County DES's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:

- e. The portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;
  - f. The portable emissions unit is equipped with best available technology;
  - g. The portable emission unit owner has identified the proposed site to Ohio EPA;
  - h. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
  - i. A public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;
  - j. 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,
  - k. The portable emissions unit owner has provided Ohio EPA with fifteen days written notice of the relocation.
3. Any site approvals issued by the Ohio EPA, pursuant to F.2. above, shall be valid for no longer than three years and are subject to renewal.

In order for the Hamilton County DES and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile 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 the Hamilton County DES (250 William Howard Taft Road, Cincinnati, OH 45219) and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, the Hamilton County DES

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.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
Recycled Asphalt Storage Piles	OAC rule 3745-31-05	2.45 TPY PM 1.23 TPY PM <sub>10</sub>
		See term A.2.2.a.
		See terms A.2.2.b. and B.1.
		See Part I, term A.7.
	OAC rule 3745-15-07	
	OAC rule 3745-17-07(B)	Less stringent than OAC rule 3745-31-05.
	OAC rule 3745-17-08(B)	See Term A.2.2.b.

**2. Additional Terms and Conditions**

- 2.a There shall be no visible emissions of fugitive dust from the material storage piles except for a period of time not to exceed one minute during any sixty-minute observation period.

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- 2.b All recycled asphalt storage piles shall contain sufficient moisture so as to minimize or eliminate visible emissions of fugitive dust caused by wind erosion.
- 2.c Compliance with OAC rule 3745-31-05 shall be demonstrated by the visible emission limitations and maintaining the material in a moist condition.

**B. Operational Restrictions**

- 1. The permittee shall limit the drop height of the front-end loaders to fifteen (15) feet or less during the loading onto and the loadout from all recycled asphalt storage piles.

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**C. Monitoring and/or Recordkeeping Requirements**

None.

**D. Reporting Requirements**

None.

**E. Testing Requirements**

1. Compliance with the fugitive visible particulate emission limitations shall be demonstrated by the methods outlined in Ohio Administrative Code (OAC) rule 3745-17-03 (B) (3).

**F. Miscellaneous Requirements**

None.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
unpaved roadways and parking areas	OAC rule 3745-31-05	1.17 TPY PM and 0.33 TPY PM10  no visible particulate emissions except for 3 minutes during any 60-minute period  best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.g)
	OAC rule 3745-15-07	See Part I, term A.7.  less stringent than the above-mentioned visible emission limitation
	OAC rule 3745-17-07 (B)(5)	less stringent than the above-mentioned control measure requirements
	OAC rule 3745-17-08 (B), (B)(2)	

**2. Additional Terms and Conditions**

- 2.a The unpaved roadways and parking areas that are covered by this permit and subject to

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the above-mentioned requirements are listed below:

unpaved roadways:

Plant Entrance Area

unpaved parking areas:

None

- 2.b The permittee shall employ best available control measures on all unpaved roadways and parking areas 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 treat the unpaved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c 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 an 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.
- 2.d Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using appropriate dust control measures for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.
- 2.e 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.
- 2.f Open-bodied vehicles 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.
- 2.g Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available

technology requirements of OAC rule 3745-31-05.

**B. Operational Restrictions**

None.

**C. Monitoring and/or Recordkeeping Requirements**

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

<u>unpaved roadways</u>	<u>minimum inspection frequency</u>
Plant area entrance	Daily

<u>unpaved parking areas</u>	<u>minimum inspection frequency</u>
None	

- 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 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. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- 4. The permittee shall maintain records of the following information:
  - a. The date and reason any required inspection was not performed, 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.

**D. Reporting Requirements**

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and,
  - b. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitation for the unpaved roadways and parking areas 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)(d) of OAC rule 3745-17-03.

**F. Miscellaneous Requirements**

None