Facility ID: 0145000331 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.

Go to Part II for Emissions Unit F002
Go to Part II for Emissions Unit F003

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Facility ID: 0145000331 Emissions Unit ID: F002 Issuance type: Final State Permit To Operate

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Piles - Load-in and load-out of storage piles	OAC rule 3745-31-05 (A)(3) PTI #01-8029	Particulate emissions shall not exceed 1.20 tons per year. No visible emissions except for 3 minutes in any hour. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.a - A.2.d).
Storage Piles - Wind erosion from storage piles	OAC rule 3745-31-05 (A)(3) PTI #01-8029	Particulate emissions shall not exceed 0.12 ton per year. No visible emissions except for 3 minutes in any hour. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.a - A.2.d).

2. **Additional Terms and Conditions**

   (a) 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 reduce the volume of product in storage piles if possible, store more product in raw form rather than finished form if possible, and limit operations during poor weather conditions to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
   The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
   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 reduce the volume of product in storage piles if possible, store more product in raw form rather than finished form if possible, and limit operations during poor weather conditions to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
   The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping 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

   Hardwood Raw Bark weekly
   Ground Hardwoods weekly
   Ground Cypress weekly
   Finished Hardwoods weekly

2. Except as otherwise provided in this section, the permittee shall perform inspections of each load- out operation at each storage pile in accordance with the following frequencies:
   storage pile identification minimum load-out inspection frequency

   Hardwood Raw Bark weekly
   Ground Hardwoods weekly
   Ground Cypress weekly
   Finished Hardwoods weekly

3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

   storage pile identification minimum wind erosion inspection frequency
   Hardwood Raw Bark weekly
   Ground Hardwoods weekly
   Ground Cypress weekly
   Finished Hardwoods weekly

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity 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.

5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

6. 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.

7. 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, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

   The information required in 7.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.

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. Emission limitation:
   No visible emissions except for 3 minutes in any hour.

   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.

2. Emission limitation:

Particulate emission shall not exceed 1.20 tons per year.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the volume, in tons, of each separate storage pile by the RACM emission factor of 1.0 lb per ton. Then multiply that number by the percentage of each mulch pile that the emission factor is applicable to (based on size of particles) and add the emissions from each pile together.

3. Emission limitation:
Particulate emission shall not exceed 0.12 ton per year.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the AP-42 emission factor of 0.45 lb per day per acre by the total number of acres of mulch piles (max = 1.5), then multiply by 365 days per year and divide by 2000 lb per ton.

F. **Miscellaneous Requirements**

1. None

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Mulch transfer points	OAC rule 3745-31-05 (A)(3) PTI #01-8029	Particulate emission shall not exceed 10.56 tons per year. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.a through A.2.d) Visible particulate emissions shall not exceed twenty percent as a three- minute average.

2. **Additional Terms and Conditions**

(a) The mulch transfer operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

All mulch transfer operations on-site.
The permittee shall employ best available control measures for the above-identified mulch transfer operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to reduce the volume of product in storage piles if possible, store more product in raw form rather than finished form if possible, and limit operations during poor weather conditions to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
For each mulch transfer operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the mulch transfer operation(s) 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 rule 3745- 31-05.

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping Requirements**

1. Except as otherwise provided in this section, for mulch transfer operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

   mulch transfer operation(s) minimum inspection frequency

   Bark Loading - Hardwood weekly
   Loading Hopper - Hardwood weekly
   Loading Hopper - Cypress weekly
   Conveyor Discharge - Cypress weekly
   Bulk Loading Hopper weekly
   Bark Processing - Hardwood weekly

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 maintain records of the following information:

   a. the date and reason any required inspection was not performed;

   b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s):

   c. the dates the control measure(s) was (were) implemented; and

   d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

   The information in 4.d. shall be kept separately for each material handling operation identified above, and 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; and

   b. each instance when a control measure, that was to be performed 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. Emission limitation:
   Visible particulate emissions shall not exceed twenty percent as a three-minute average.

   Applicable Compliance Method:
   Compliance with the visible emission limitations for the transfer points 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.

2. Emission limitation:
   Particulate emission shall not exceed 10.56 tons per year.

   Applicable Compliance Method:
   Compliance shall be demonstrated by multiplying the volume, in tons, through each separate transfer point by the RACM emission factor of 1.0 lb per ton. Then multiply that number by the percentage of each transfer point throughput that the emission factor is applicable to (based on size of particles) and add the emissions from each transfer point together.

F. **Miscellaneous Requirements**

1. None