



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

**RE: PERMIT TO INSTALL DRAFT
PORTAGE COUNTY
Application No: 16-1934**

CERTIFIED MAIL**DATE:** June 30, 1999

Oscar Brugmann Sand & Gravel, Inc
Roy Brugmann
3828 Dudley Road
Mantua, OH 44255

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$3300** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

cc: USEPA
AKRON REGIONAL AIR QUALITY MANAGEMENT

West Virginia Division of Environmental Protection
Pennsylvania Department of Environmental Resources

Akron Metropolitan Area Transportation Study



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT OF PERMIT TO INSTALL 16-1934

Application Number: 16-1934
APS Premise Number: 1667050040
Permit Fee: **To be entered upon final issuance**
Name of Facility: Oscar Brugmann Sand & Gravel, Inc
Person to Contact: Roy Brugmann
Address: 3828 Dudley Road
Mantua, OH 44255

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3828 Dudley Road
Mantua, OHIO**

Description of proposed emissions unit(s):
THREE AGGREGATE PROCSSING PLANTS.

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

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

Oscar Brugmann Sand & Gravel, Inc

Facility ID: 1667050040

PTI Application: 16-1934

Draft PTI (Date will be entered upon final issuance)

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

6

Oscar Brugmann Sand & Gravel, Inc

PTI Application: **16-1934**

Draft PTI (Date will be entered upon final issuance)

Facility ID: **1667050040**

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	66.8

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>
Aggregate Processing Plant #1	OAC rule 3745-31-05
log washer	
primary crusher	40 CFR Part 60, subpart OOO
two tertiary wet screening operations	
primary screening operation	40 CFR Part 60, subpart OOO
wet classifier	
three wet sand screws	
surge bin	40 CFR Part 60, subpart OOO
material handling operations: conveying, transfer points, and load-in to the feed hopper via truck dumping	
secondary wet screening operation	40 CFR Part 60, subpart OOO

Draft PTI (Date will be entered upon final issuance)

	<u>Applicable Emissions Limitations/Control Measures</u>	
	<p>35.4 tons of particulate matter (PM) per year (See A.2.h below)</p>	<p>line up to the next crusher, grinding mill, or storage bin (see Section A.2.g).</p> <p>There shall be no visible particulate emissions from the log washer.</p>
<p>OAC rule 3745-31-05</p>	<p>Use of reasonable available control measures (RACM) (See A.2.b below)</p>	<p>There shall be no visible particulate emissions from the tertiary wet screening operations.</p>
<p>OAC rule 3745-31-05</p>	<p>No permittee shall cause to be discharged into the atmosphere from any crusher, at which a capture system is not used, fugitive emissions which exhibit greater than 15 percent opacity.</p>	<p>There shall be no visible particulate emissions from the wet classifier.</p>
<p>OAC rule 3745-31-05</p>	<p>No permittee shall cause to be discharged into the atmosphere from any screening operation any fugitive emissions which exhibit greater than 10 percent opacity (see Section A.2.g).</p>	<p>There shall be no visible particulate emissions from the wet sand screws.</p>
<p>OAC rule 3745-31-05</p>	<p>No permittee shall cause to be discharged into the atmosphere from any screening operation any fugitive emissions which exhibit greater than 10 percent opacity (see Section A.2.g).</p>	<p>20% opacity, as a 3-minute average for truck dumping into the feed hopper</p>
<p>OAC rule 3745-31-05</p>	<p>No permittee shall cause to be discharged into the atmosphere from any storage bin any fugitive emissions which exhibit greater than 10 percent opacity (see Section A.2.g).</p>	<p>best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.f)</p>
<p>40 CFR Part 60, subpart OOO</p>	<p>No permittee shall cause to be discharged into the atmosphere any visible emissions from wet screening operations and subsequent screening operations, bucket elevators, and belt conveyors that process saturated material in the production</p>	<p>No permittee shall cause to be discharged into the atmosphere from any transfer point any fugitive emissions which exhibit greater than 10 percent opacity (see Section A.2.g).</p>
	<p>No permittee shall cause to be discharged into the atmosphere any visible emissions from wet screening operations and subsequent screening</p>	<p>No permittee shall cause to be discharged into the atmosphere any visible emissions from wet screening operations and subsequent screening</p>

operations, bucket elevators, and belt conveyors that process saturated material in the production line up to the next crusher, grinding mill, or storage bin (see Section A.2.g).

Oscar

PTI A₁

Draft PTI (Date will be entered upon final issuance)

Emissions Unit ID: F001

2. Additional Terms and Conditions

- 2.a** This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B).
- 2.b** The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust from emissions unit F001. If the inherent moisture in the sand and gravel is not sufficient to comply with the opacity restrictions of this permit, the permittee shall install equipment to apply water, or any other suitable dust suppressant, at appropriate locations in the production line.
- 2.c** The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

<u>Emission Point</u>	<u>Equipment Type</u>	<u>Opacity Limit</u>	<u>Regulatory Basis for Limit</u>
truck dumping 3745-31-03 into feed hopper F1	front-end loaders/ feed hopper	20% as 3-minute average	OAC rule
feed hopper F1 to 60, subpart belt conveyor C1	transfer point	10%	40 CFR Part OOO
primary crusher to subpart belt conveyor C1	transfer point	10%	40 CFR Part 60, OOO
belt conveyor C1 to belt conveyor C2	transfer point 60,	10%	40 CFR Part subpart OOO
belt conveyor C2 to primary screening	transfer point 60,	10%	40 CFR Part subpart OOO

Oscar

PTI A₁

Draft PTI (Date will be entered upon final issuance)

Emissions Unit ID: F001

operation S1				
primary screening	transfer point 60,	10%	40 CFR Part	
operation S1 to belt conveyor C3			subpart OOO	
belt conveyor C3	transfer point 60,	10%	40 CFR Part	
to belt conveyor C4			subpart OOO	
primary screening	transfer point 60,	10%	40 CFR Part	
operation S1 to belt conveyor C5			subpart OOO	
belt conveyor C5	transfer point 60,	10%	40 CFR Part	
to belt conveyor C6			subpart OOO	
belt conveyor C6	transfer point 60,	10%	40 CFR Part	
to surge bin B1			subpart OOO	
surge bin B1 to	transfer point 60,	10%	40 CFR Part	
belt conveyor C7			subpart OOO	
belt conveyor C7	transfer point 60,	10%	40 CFR Part	
to belt conveyor C8			subpart OOO	
belt conveyor C8	transfer point 60,	10%	40 CFR Part	
to secondary wet screening operation S2			subpart OOO	
secondary wet	transfer point rule 3745-31-05	no visible emissions	OAC	

Draft PTI (Date will be entered upon final issuance)

screening operation S2 to log washer			
log washer to	transfer point OAC rule 3745-31-05	no visible emissions	
tertiary wet screening operation S3			
tertiary wet	transfer point CFR Part 60,	no visible emissions	40
screening operation S3 to belt conveyor C9			subpart 000
tertiary wet	transfer point CFR Part 60,	no visible emissions	40
screening operation S3 to belt conveyor C10			subpart 000
belt conveyor C10	transfer point CFR Part 60,	no visible emissions	40
to tertiary wet screening operation S4			subpart 000
tertiary wet	transfer point CFR Part 60,	no visible emissions	40
screening operation S4 to belt conveyor C11			subpart 000
tertiary wet	transfer point CFR Part 60,	no visible emissions	40
screening operation S4 to belt conveyor C12			subpart 000
tertiary wet	transfer point CFR Part 60,	no visible emissions	40
screening operation S4 to belt conveyor C13			subpart 000
secondary wet	transfer point	no visible emissions	OAC

rule 3745-31-05 screening operation S2 to wet classifier CL1			
wet classifier CL1 transfer point rule 3745-31-05 to wet sand screw SS1	no visible emissions		OAC
wet sand screw transfer point CFR Part 60, SS1 to belt conveyor C14	no visible emissions		40 subpart OOO
wet classifier CL1 transfer point rule 3745-31-05 to wet sand screw SS2	no visible emissions		OAC
wet sand screw transfer point CFR Part 60, SS2 to belt conveyor C15	no visible emissions		40 subpart OOO
wet classifier CL1 transfer point rule 3745-31-05 to wet sand screw SS3	no visible emissions		OAC
wet sand screw transfer point CFR Part 60, SS3 to belt conveyor C16	no visible emissions		40 subpart OOO

2.d The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

Draft PTI (Date will be entered upon final issuance)

material handling operation(s)

control measure(s)

truck dumping into feed hopper

maintain a low drop height and a high moisture content for the material being processed

transfer points listed in Section A.2.a of these terms and conditions with a 10% opacity limitation

maintain a high moisture content for the material being processed

transfer points listed in Section A.2.a of these terms and conditions with no visible emissions limitation

wet screening

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

- 2.e** For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.f** 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.
- 2.g** Compliance with the opacity limitations shall have been achieved on and after the sixtieth day after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup.
- 2.h** The 35.4 TPY PM limitation was established for PTI purposes to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

Draft PTI (Date will be entered upon final issuance)

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the primary crusher, the primary screening operation, the surge bin, the secondary wet screening operation, the log washer, each tertiary wet screening operation, the wet classifier, and each wet sand screw. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and,
- e. any corrective actions taken to eliminate the visible emissions.

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

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
all	daily

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

4. 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.

5. The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control 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.

Draft PTI (Date will be entered upon final issuance)

The information in 5.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 semiannual written reports which (a) identify all days during which any visible particulate emissions of fugitive were observed from the primary crusher, the primary screening operation, the surge bin, the secondary wet screening operation, the log washer, each tertiary wet screening operation, the wet classifier, and/or each wet sand screw and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. 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.
3. The permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in Section 60.672 of 40 CFR Part 60, subpart OOO, including reports of opacity observations made using Method 9.
4. The permittee of any screening operation, bucket elevator, or belt conveyor that processes saturated material and is subject to the no visible emission limit and subsequently processes unsaturated materials, 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 10 percent opacity limit and the emission test requirements of Section 60.11 of 40 CFR Part 60, subpart A and 40 CFR Part 60, subpart OOO. Likewise 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.
5. A notification of the actual date of initial startup of each affected facility shall be submitted to the Administrator. For a combination of affected facilities in a production line that begin actual initial

Draft PTI (Date will be entered upon final issuance)

startup on the same day, a single notification of startup may be submitted by the permittee to the Administrator. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.

6. The permittee shall submit the following information for each piece of equipment that is replaced by a piece of equipment of equal or smaller size having the same function as the existing facility:

- a. for a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station:
 - i. the rated capacity in tons per hour of the existing facility being replaced; and,
 - ii. the rated capacity in tons per hour of the replacement equipment;
- b. for a screening operation:
 - i. the total surface area of the top screen of the existing screening operation being replaced; and,
 - ii. the total surface area of the top screen of the replacement screening operation;
- c. for a conveyor belt:
 - i. the width of the existing belt being replaced; and,
 - ii. the width of the replacement conveyor belt; and,
- d. for a storage bin:
 - i. the rated capacity in tons of the existing bin being replaced; and,
 - ii. the rated capacity in tons of replacement storage bins.

The notification shall be submitted within 30 days after equipment replacement.

7. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 90 days after the final issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with opacity emission limitations for the primary crusher, the primary screening operation, the surge bin, and the transfer points listed in Section A.2.c of these terms and conditions with an emission limitation of 10% opacity and subject to 40 CFR Part 60, subpart OOO.
 - c. The following test method(s) shall be employed to demonstrate compliance: for particulate emissions Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A, with the following additions:
 - i. The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
 - ii. The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed.
 - iii. For affected facilities using wet dust suppression for particulate matter control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible.
 - d. When demonstrating compliance with the fugitive emissions standard for any crusher at which a capture system is not used as described under Section 60.672(c) of 40 CFR Part 60, subpart OOO, the duration of the Method 9 observations may be reduced from 3 hours (thirty 6-minute averages) to 1 hour (ten 6-minute averages) only if the following conditions apply:
 - i. there are no individual readings greater than 15 percent opacity; and,

Draft PTI (Date will be entered upon final issuance)

- ii. there are no more than 3 readings of 15 percent for the 1-hour period.
 - e. When demonstrating compliance with the fugitive emissions standard for the primary screening operation, the surge bin, and the transfer points listed in Section A.2.c of these terms and conditions with an emission limitation of 10% opacity and subject to 40 CFR Part 60, subpart OOO, the duration of the Method 9 observations may be reduced from 3 hours (thirty 6-minute averages) to 1 hour (ten 6-minute averages) only if the following conditions apply:
 - i. there are no individual readings greater than 10 percent opacity; and,
 - ii. there are no more than 3 readings of 10 percent for the 1-hour period.
 - f. 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.
2. 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).
 3. 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.
 4. 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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
 5. The initial performance tests required in Sections E.1 through E.4 of these terms and conditions is

Emissions Unit ID: **F001**

not required for wet screening operations and subsequent screening operations, bucket elevators, and belt conveyors that process saturated material in the production line up to, but not including the next crusher, grinding mill, or storage bin.

6. 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

35.4 tons of PM per year

Applicable Compliance Method

Total Emissions = Primary Crushing + Feed Hopper Screening + Primary Screening + Secondary Screening + Tertiary Screening + Load-in to Feed Hopper + Transfer and Conveying

Primary Crushing: Multiply the AP-42 emission factor (AP-42, Table 11.19.2-2 (1/95)) of 0.0007 pound of particulate emissions per ton of material throughput by the maximum annual material throughput rate, then divided by 2000.

Draft PTI (Date will be entered upon final issuance)

Primary Screening: Multiply the AP-42 emission factor (AP-42, Table 11.19.2-2 (1/95)) of 0.0315* pound of particulate emissions per ton of material throughput by the maximum annual material throughput rate. Then multiply the resulting uncontrolled emission rate by a moisture control factor of 80% (1-.80), then divided by 2000.

Feed Hopper Screening: Multiply the AP-42 emission factor (AP-42, Table 11.19.2-2 (1/95)) of 0.0315* pound of particulate emissions per ton of material throughput by the maximum annual material throughput rate. Then multiply the resulting uncontrolled emission rate by a moisture control factor of 80% (1-.80), then divided by 2000.

Secondary Screening: Multiply the AP-42 emission factor (AP-42, Table 11.19.2-2 (1/95)) of 0.001764* pound of particulate emissions per ton of material throughput by the maximum annual material throughput rate, then divided by 2000.

Tertiary Screening: For each screen, multiply the AP-42 emission factor (AP-42, Table 11.19.2-2 (1/95)) of 0.1491* pound of particulate emissions per ton of material throughput by the maximum annual material throughput rate. Then multiply the resulting uncontrolled emission rate by a control factor of 99% (1-.99), then divided by 2000.

Load-in to Feed Hopper: Multiply the AP-42 derived emission factor (AP-42, Chapter 13.2.4 equation 1 (1/95)) of 0.003 pound of particulate emissions per ton of loaded-in by the maximum annual amount of material loaded-in, then divided by 2000.

Transfer and Conveying: Multiply the Fire 6.01 emission factor (US EPA Fire 6.01 SCC 30502503) of 0.029 pound of particulate emissions per ton of product by the maximum annual amount of product. Then multiply the resulting uncontrolled emission rate by a control factor of 90% (1-.90), then divided by 2000.

*Emission factor was multiplied by 2.1 to convert the emission factor from PM-10 to total suspended particulate.

b. Emission Limitation

20% opacity as a three-minute average

Applicable Compliance Method

OAC rule 3745-17-03(B)(3)

c. Emission Limitation

15% opacity for the primary crusher

Oscar

PTI A₁

Emissions Unit ID: **F001**

Draft PTI (Date will be entered upon final issuance)

Applicable Compliance Method

Compliance shall be demonstrated using US EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A as required in sections E.1 through E.4 of these terms and conditions.

d. Emission Limitation

10% opacity for the primary screening operation, the surge bin, and the transfer points listed in Section A.2.c of these terms and conditions.

Applicable Compliance Method

Compliance shall be demonstrated using US EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A as required in sections E.1 through E.4 of these terms and conditions.

e. Emission Limitation

no visible particulate emissions

Applicable Compliance Method

Method 22 of 40 CFR Part 60, Appendix A

F. Miscellaneous Requirements

None.

PART II: SPECIAL TERMS AND CONDITIONS

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.

Operations, Property, and/or <u>Equipment</u>	material handling operations: conveying, transfer points, and load-in to the plate feeder via truck dumping	<u>Applicable Rules/Requirements</u>
Aggregate Processing Plant #3		OAC rule 3745-31-05
primary crusher		40 CFR Part 60, subpart 000
primary screening operation		40 CFR Part 60, subpart 000
surge bin		40 CFR Part 60, subpart 000

Oscar

PTI A₁

Draft PTI (Date will be entered upon final issuance)

Emissions Unit ID: F003

OAC rule 3745-31-05

40 CFR Part 60, subpart
OOO

Applicable Emissions
Limitations/Control Measures

24.0 tons of particulate matter (PM) per year (See A.2.h below)

Use of reasonable available control measures (RACM) (See A.2.b below)

No permittee shall cause to be discharged into the atmosphere from any crusher, at which a capture system is not used, fugitive emissions which exhibit greater than 15 percent opacity.

No permittee shall cause to be discharged into the atmosphere from any screening operation any fugitive emissions which exhibit greater than 10 percent opacity (see Section A.2.g).

No permittee shall cause to be discharged into the atmosphere from any storage bin any fugitive emissions which exhibit greater than 10 percent opacity (see Section A.2.g).

20% opacity, as a 3-minute average for truck dumping into the plate feeder

best available control measures that are sufficient

to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.f)

No permittee shall cause to be discharged into the atmosphere from any transfer point any fugitive emissions which exhibit greater than 10 percent opacity (see Section A.2.g).

Draft PTI (Date will be entered upon final issuance)

2. Additional Terms and Conditions

2.a This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B).

2.b The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust from emissions unit F003. If the inherent moisture in the stone is not sufficient to comply with the opacity restrictions of this permit, the permittee shall install equipment to apply water, or any other suitable dust suppressant, at appropriate locations in the production line.

2.c The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

<u>Emission Point</u>	<u>Equipment Type</u>	<u>Opacity Limit</u>	<u>Regulatory Basis for Limit</u>
truck dumping 3745-31-03 into plate feeder F1	front-end loaders/ feed hopper	20% as 3-minute average	OAC rule
plate feeder F1 to belt conveyor C1	transfer point	10% CFR Part 60, subpart OOO	40
primary crusher CR1	transfer point	10%	40 CFR Part 60,

subpa
rt

Oscar

PTI A₁

Emissions Unit ID: F003

Draft PTI (Date will be entered upon final issuance)

to belt conveyor C1			000
belt conveyor C1	transfer point CFR Part 60,	10%	40
to belt conveyor C2			subpart 000
belt conveyor C2	transfer point CFR Part 60,	10%	40
to surge bin B1			subpart 000
surge bin B1 to	transfer point CFR Part 60,	10%	40
to belt conveyor C3			subpart 000
belt conveyor C3	transfer point CFR Part 60,	10%	40
to primary screening			subpart 000
operation S1			
primary screening	transfer point CFR Part 60,	10%	40
operation S1 to belt conveyor C4			subpart 000
belt conveyor C4	transfer point CFR Part 60,	10%	40
to belt conveyor C5			subpart 000
primary screening	transfer point CFR Part 60,	10%	40
operation S1 to belt conveyor C6			subpart 000
primary screening	transfer point CFR Part 60,	10%	40
operation S1 to belt conveyor C7			subpart 000

2.d The permittee shall employ best available control measures for the

Oscar Brugmann Sand & Gravel, Inc

PTI Application: 16-1034

Draft

Facility ID: 1667050040

Emissions Unit ID: **F003**

above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

Draft PTI (Date will be entered upon final issuance)material handling operation(s)control measure(s)

truck dumping into plate feeder

maintain a low drop height and a high moisture content for the material being processed

transfer points

maintain a high moisture content for the material being processed

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

- 2.e** For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.f** 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.
- 2.g** Compliance with the opacity limitations shall have been achieved on and after the sixtieth day after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup.
- 2.h** The 24.0 TPY PM limitation was established for PTI purposes to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

Draft PTI (Date will be entered upon final issuance)

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the primary crusher, the primary screening operation, and the surge bin. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and,
 - e. any corrective actions taken to eliminate the visible emissions.

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

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
all	daily

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

4. 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.

5. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s):

Emissions Unit ID: **F003**

- 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 5.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.

Draft PTI (Date will be entered upon final issuance)**D. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions of fugitive were observed from the primary crusher, the primary screening operation, and/or the surge bin and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. 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.
3. The permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in Section 60.672 of 40 CFR Part 60, subpart OOO, including reports of opacity observations made using Method 9.
4. The permittee of any screening operation, bucket elevator, or belt conveyor that processes saturated material and is subject to the no visible emission limit and subsequently processes unsaturated materials, 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 10 percent opacity limit and the emission test requirements of Section 60.11 of 40 CFR Part 60, subpart A and 40 CFR Part 60, subpart OOO. Likewise 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.
5. A notification of the actual date of initial startup of each affected facility shall be submitted to the Administrator. For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the permittee to the Administrator. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.
6. The permittee shall submit the following information for each piece of equipment that is replaced

Draft PTI (Date will be entered upon final issuance)

by a piece of equipment of equal or smaller size having the same function as the existing facility:

- a. for a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station:

Draft PTI (Date will be entered upon final issuance)

- i. the rated capacity in tons per hour of the existing facility being replaced; and,
 - ii. the rated capacity in tons per hour of the replacement equipment;
- b. for a screening operation:
 - i. the total surface area of the top screen of the existing screening operation being replaced; and,
 - ii. the total surface area of the top screen of the replacement screening operation;
- c. for a conveyor belt:
 - i. the width of the existing belt being replaced; and,
 - ii. the width of the replacement conveyor belt; and,
- d. for a storage bin:
 - i. the rated capacity in tons of the existing bin being replaced; and,
 - ii. the rated capacity in tons of replacement storage bins.

The notification shall be submitted within 30 days after equipment replacement.

7. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 90 days after the final issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with opacity emission limitations for the primary crusher, the primary screening operation, the surge bin, and the transfer points listed in Section A.2.c of these terms and conditions.

Oscar Brugmann Sand & Gravel, Inc

PTI Application: 16-1034

Draft

Facility ID: 1667050040

Emissions Unit ID: **F003**

- c. The following test method(s) shall be employed to demonstrate compliance: for particulate emissions Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A, with the following additions:

Draft PTI (Date will be entered upon final issuance)

- i. The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
 - ii. The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed.
 - iii. For affected facilities using wet dust suppression for particulate matter control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible.
 - d. When demonstrating compliance with the fugitive emissions standard for any crusher at which a capture system is not used, the duration of the Method 9 observations may be reduced from 3 hours (thirty 6-minute averages) to 1 hour (ten 6-minute averages) only if the following conditions apply:
 - i. there are no individual readings greater than 15 percent opacity; and,
 - ii. there are no more than 3 readings of 15 percent for the 1-hour period.
 - e. When demonstrating compliance with the fugitive emissions standard for the primary screening operation, the surge bin, and the transfer points listed in Section A.2.c of these terms and conditions, the duration of the Method 9 observations may be reduced from 3 hours (thirty 6-minute averages) to 1 hour (ten 6-minute averages) only if the following conditions apply:
 - i. there are no individual readings greater than 10 percent opacity; and,
 - ii. there are no more than 3 readings of 10 percent for the 1-hour period.
 - f. 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.
2. 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

OscarPTI A₁Emissions Unit ID: **F003****Draft PTI (Date will be entered upon final issuance)**

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).

Draft PTI (Date will be entered upon final issuance)

3. 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.
4. 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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. 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

24.0 tons of PM per year

Applicable Compliance Method

Total Emissions = Primary Crushing + Feed Hopper Screening + Primary Screening + Load-in to Plate Feeder + Transfer and Conveying

Primary Crushing: Multiply the AP-42 emission factor (AP-42, Table 11.19.2-2 (1/95)) of 0.005* pound of particulate emissions per ton of material throughput by the maximum annual material throughput rate. Then multiply the resulting uncontrolled emission rate by a moisture control factor of 80% (1-.80), then divided by 2000.

Primary Screening: Multiply the AP-42 emission factor (AP-42, Table 11.19.2-2 (1/95)) of 0.0315* pound of particulate emissions per ton of material throughput by the maximum annual material throughput rate. Then multiply the resulting uncontrolled emission rate by a moisture control factor of 80% (1-.80), then divided by 2000.

Feed Hopper Screening: Multiply the AP-42 emission factor (AP-42, Table 11.19.2-2 (1/95)) of 0.0315* pound of particulate emissions per ton of material throughput by the maximum annual material throughput rate. Then multiply the

Emissions Unit ID: F003

resulting uncontrolled emission rate by a moisture control factor of 80% (1-.80), then divided by 2000.

Load-in to Plate Feeder: Multiply the AP-42 derived emission factor (AP-42, Chapter 13.2.4 equation 1 (1/95)) of 0.003 pound of particulate emissions per ton of loaded-in by the maximum annual amount of material loaded-in, then divided by 2000.

Transfer and Conveying: For each transfer point, multiply the AP-42 (9/95, Table 11.19.2-2) emission factor of 0.0029 pounds of particulate emissions per ton of material throughput by the maximum annual material throughput rate. Then multiply the resulting uncontrolled emission rate by a moisture control factor of 80% (1-.80), then divided by 2000.

*Emission factor was multiplied by 2.1 to convert the emission factor from PM-10 to total suspended particulate.

b. Emission Limitation

20% opacity as a three-minute average

Applicable Compliance Method

OAC rule 3745-17-03(B)(3)

c. Emission Limitation

15% opacity for the primary crusher

Applicable Compliance Method

Compliance shall be demonstrated using US EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A as required in sections E.1 through E.4 of these terms and conditions.

d. Emission Limitation

10% opacity for the primary screening operation, the surge bin, and the transfer points listed in Section A.2.c of these terms and conditions.

Applicable Compliance Method

Oscar

PTI A₁

Draft PTI (Date will be entered upon final issuance)

Emissions Unit ID: **F003**

Compliance shall be demonstrated using US EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A as required in sections E.1 through E.4 of these terms and conditions.

F. Miscellaneous Requirements

None.

Oscar

PTI A₁

Emissions Unit ID: F004

Draft PTI (Date will be entered upon final issuance)

PART II: SPECIAL TERMS AND CONDITIONS

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.

Operations, Property, and/or Equipment	via truck dumping	Applicable <u>Rules/Requirements</u>
Aggregate Processing Plant #4		OAC rule 3745-31-05
primary screening operation		40 CFR Part 60, subpart OOO
wet sand screw		OAC rule 3745-31-05
material handling operations: conveying, transfer points, and load-in to the belt feeder		OAC rule 3745-31-05

Oscar

PTI A₁

Draft PTI (Date will be entered upon final issuance)

Emissions Unit ID: F004

40 CFR Part 60, subpart
OOO

Applicable Emissions
Limitations/Control Measures

7.4 tons of particulate matter (PM) per year (See A.2.h below)

Use of reasonable available control measures (RACM) (See A.2.b below)

No permittee shall cause to be discharged into the atmosphere any visible 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 (see Section A.2.g).

There shall be no visible particulate emissions from the wet sand screw.

20% opacity, as a 3-minute average for truck dumping into the belt feeder

best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.f)

No permittee shall cause to be discharged into the atmosphere from any transfer point any fugitive emissions which exhibit greater than 10 percent opacity (see Section A.2.g).

No permittee shall cause to be discharged into the atmosphere any visible 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 (see Section A.2.g).

2. Additional Terms and Conditions

- 2.a** This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A) and OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-07(B).
- 2.b** The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust from emissions unit F004. If the inherent moisture in the sand and gravel is not sufficient to comply with the opacity restrictions of this permit, the permittee shall install equipment to apply water, or any other suitable dust suppressant, at appropriate locations in the production line.
- 2.c** The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

<u>Emission Point</u>	<u>Equipment Type</u>	<u>Opacity Limit</u>	<u>Regulatory Basis for Limit</u>	
truck dumping 3745-31-03 into belt feeder F1	front-end loaders/ feed hopper	20% as 3-minute average	OAC	rule
belt feeder F1 to belt conveyor C1	transfer point CFR Part 60,	10%	40	subpart OOO
belt conveyor C1 to primary screening operation S1	transfer point CFR Part 60,	10%	40	subpart OOO
primary screening operation S1 to belt conveyor C2	transfer point 40 CFR Part 60,	no visible emissions		subpart OOO
primary screening operation S1 to belt	transfer point 40 CFR Part 60,	no visible emissions		subpart OOO

Oscar

PTI A₁

Draft PTI (Date will be entered upon final issuance)

Emissions Unit ID: F004

conveyor C3

primary screening	transfer point 40 CFR Part 60,	no visible emissions
operation S1 to wet sand screw SS1		subpart OOO

wet sand screw SS1 40 CFR Part 60, to belt conveyor C4	transfer point	no visible emissions
		subpart OOO

belt conveyor C4 to belt conveyor C5	transfer point 40 CFR Part 60,	no visible emissions
		subpart OOO

- 2.d** The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
truck dumping into belt feeder	maintain a low drop height and a high moisture content for the material being processed
transfer points	maintain a high moisture content for the material being processed and employ wet screening

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

- 2.e** For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of

Draft PTI (Date will be entered upon final issuance)

the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

- 2.f** 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.
- 2.g** Compliance with the opacity limitations shall have been achieved on and after the sixtieth day after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup.
- 2.h** The 7.4 TPY PM limitation was established for PTI purposes to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the primary screening operation and the wet sand screw. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and,
 - e. any corrective actions taken to eliminate the visible emissions.
- 2. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in

accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
all	daily

3. The above-mentioned inspections shall be performed during representative, normal operating conditions.
4. 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.
5. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control 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 5.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 semiannual written reports which (a) identify all days during which any visible particulate emissions of fugitive were observed from the primary screening operation and/or the wet sand screw and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit deviation reports that identify any of the following occurrences:

Draft PTI (Date will be entered upon final issuance)

- 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.
3. The permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in Section 60.672 of 40 CFR Part 60, subpart OOO, including reports of opacity observations made using Method 9.
4. The permittee of any screening operation, bucket elevator, or belt conveyor that processes saturated material and is subject to the no visible emission limit and subsequently processes unsaturated materials, 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 10 percent opacity limit and the emission test requirements of Section 60.11 of 40 CFR Part 60, subpart A and 40 CFR Part 60, subpart OOO. Likewise 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.
5. A notification of the actual date of initial startup of each affected facility shall be submitted to the Administrator. For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the permittee to the Administrator. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.
6. The permittee shall submit the following information for each piece of equipment that is replaced by a piece of equipment of equal or smaller size having the same function as the existing facility:
 - a. for a screening operation:
 - i. the total surface area of the top screen of the existing screening operation being replaced; and,
 - ii. the total surface area of the top screen of the replacement screening operation;
 - b. for a conveyor belt:

- i. the width of the existing belt being replaced; and,
- ii. the width of the replacement conveyor belt; and,

The notification shall be submitted within 30 days after equipment replacement.

7. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 90 days after the final issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with opacity emission limitations for the transfer points prior to the primary screening operation listed in Section A.2.c of these terms and conditions with an opacity limitation of 10%.
 - c. The following test method(s) shall be employed to demonstrate compliance: for particulate emissions Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A, with the following additions:
 - i. The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
 - ii. The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed.
 - iii. For affected facilities using wet dust suppression for particulate matter control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible.

Draft PTI (Date will be entered upon final issuance)

- d. When demonstrating compliance with the fugitive emissions standard for the transfer points prior to the primary screening operation listed in Section A.2.c of these terms and conditions with a opacity limitation of 10%, the duration of the Method 9 observations may be reduced from 3 hours (thirty 6-minute averages) to 1 hour (ten 6-minute averages) only if the following conditions apply:
 - i. there are no individual readings greater than 10 percent opacity; and,
 - ii. there are no more than 3 readings of 10 percent for the 1-hour period.
 - e. 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.
2. 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).
3. 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.
4. 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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. The initial performance tests required in Sections E.1 through E.4 of these terms and conditions is not required for wet screening operations and subsequent screening operations, bucket elevators, and belt conveyors that process saturated material in the production line up to, but not including

the next crusher, grinding mill, or storage bin.

6. 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

7.4 tons of PM per year

Applicable Compliance Method

Total Emissions = Feed Hopper Screening + Primary Screening + Load-in to Belt Feeder + Transfer and Conveying

Feed Hopper Screening: Multiply the AP-42 emission factor (AP-42 Table 11.19.2-2 (1/95)) of 0.03* pound of particulate emissions per ton of product by the maximum annual amount of product. Then multiply the resulting uncontrolled emission rate by a control factor of 80% (1-.80), then divided by 2000.

Primary Screening: Multiply the AP-42 emission factor (AP-42 Table 11.19.2-2 (1/95)) of 0.03* pound of particulate emissions per ton of product by the maximum annual amount of product. Then multiply the resulting uncontrolled emission rate by a control factor of 99% (1-.99), then divided by 2000.

Load-in to Belt Feeder: Multiply the AP-42 derived emission factor (AP-42, Chapter 13.2.4 equation 1 (1/95)) of 0.0016 pound of particulate emissions per ton of loaded-in by the maximum annual amount of material loaded-in, then divided by 2000.

Transfer and Conveying: Multiply the Fire 6.01 emission factor (US EPA Fire 6.01 SCC 30502503) of 0.029 pound of particulate emissions per ton of product by the maximum annual amount of product. Then multiply the resulting uncontrolled emission rate by a control factor of 90% (1-.90), then divided by 2000.

*Emission factor was multiplied by 2.1 to convert the emission factor from PM-10 to total suspended particulate.

b. Emission Limitation

20% opacity as a three-minute average

Applicable Compliance Method

OAC rule 3745-17-03(B)(3)

c. Emission Limitation

no visible particulate emissions for the transfer points after the primary screening operation

Applicable Compliance Method

Method 22 of 40 CFR Part 60, Appendix A

d. Emission Limitation

10% opacity for the transfer points prior to the primary screening operation listed in Section A.2.c of these terms and conditions.

Applicable Compliance Method

Compliance shall be demonstrated using US EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A as required in sections E.1 through E.4 of these terms and conditions.

e. Emission Limitation

no visible particulate emissions for the wet sand screw

54

Oscar

PTI A₁

Draft PTI (Date will be entered upon final issuance)

Emissions Unit ID: **F004**

Applicable Compliance Method

OAC rule 3745-17-03(B)(4)

F. Miscellaneous Requirements

None.