

A. Applicable Emission Limitations and/or Control Requirements

1. The following is the Best Available Technology (BAT) determination for emissions unit F001:
 - a. The annual particulate emission shall not exceed 1.22 tpy.
 - b. There shall be no visible particulate emission except for a period of time not to exceed 3 minutes during any sixty minute observation period.
2. The following is the Best Available Technology (BAT) determination for emissions unit F002:
 - a. The annual particulate emission shall not exceed 0.83 tpy.
 - b. There shall be no visible particulate emission except for a period of time not to exceed 1 minute during any sixty minute observation period.
3. The following is the Best Available Technology (BAT) determination for emissions unit F003:
 - a. The annual particulate emission shall not exceed 2.22 tpy.
 - b. At no time shall visible particulate emission exceed 20 percent opacity as a six-minute average.
 - c. These limits are based on an annual production rate of 300,000 tons per year therefore daily record keeping will be required of limestone, gravel and sand unloading and sales.
The permittee shall obtain prior Ohio EPA approval before exceeding the annual limestone, gravel and sand unloading and sales limitation
4. The following is the Best Available Technology (BAT) determination for emissions unit P001:
 - a. The Particulate Matter, Sulfur Dioxide, Carbon Monoxide, Nitrogen Oxide, and Volatile Organic Compound emissions from emission unit P001 shall not exceed: 0.43, 0.41, 1.33, 6.17 and 0.49 pounds per hour, respectively. These emission limits are based on the maximum usage thus, hourly usage record-keeping is not required.
 - b. The Particulate Matter, Sulfur Dioxide, Carbon Monoxide, Nitrogen Oxide, and Volatile Organic Compound emissions from each emissions unit P001 shall not

exceed: 0.93, 0.87, 2.86, 13.27, 1.05 tons per year.

c. These limits are based on an annual fuel consumption of 43,000 gallons per year therefore daily record keeping will be required of fuel consumption. The permittee shall obtain prior Ohio EPA approval before exceeding the annual fuel usage limitation.

d. At no time shall visible particulate emission from the cyclone stack exceed 20 percent opacity as a six-minute average.

Additional Terms and Conditions

1. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-31-05 and 3745-17-08 are listed below: all
 - a. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
 - b. All unpaved roadways and parking areas shall be treated with water and/or any other suitable dust suppression chemicals to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.
 - c. The control measures shall be implemented at frequencies that will minimize or eliminate visible emission of fugitive dust generated by vehicular traffic and ensure compliance with the above-mentioned visible emission limitations, and the needed frequencies of implementation shall be determined by the permittee's inspections. It is further understood that on any specific day implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations.
 - d. Opened bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary to minimize or eliminate visible emissions of fugitive dust.
2. The aggregate storage piles that are covered by this permit and subject to the requirements of OAC rules 3745-31-05 and 3745-17-08 are listed below: 6 limestone, 6 gravel and 2 sand.
 - a. The permittee shall load into and from the storage piles only limestone, gravel and sand that possesses adequate moisture content sufficient to minimize or eliminate fugitive particulate emissions. Dry limestone, gravel and sand shall be adequately watered prior to loading into or out of the limestone, gravel and sand storage piles in order to minimize or eliminate visible

emission of fugitive dust.

- b. The permittee shall instruct and require all front end loader operators to reduce the drop height of bucket loads of limestone, gravel and sand to the maximum extent possible in order to minimize or eliminate visible emission of fugitive dust.
 - c. The permittee shall ensure that the limestone, gravel and sand storage piles possess adequate moisture content, or are of such size shape or surface condition to minimize or eliminate visible emission of fugitive dust caused by wind erosion.
3. The limestone, gravel and sand transferring, conveying and unloading activities that are covered by this permit and subject to the requirements of OAC rules 3745-31-05 and 3745-17-08 are listed below: 10 portable conveyors and 10 transfer points.
- a. The permittee shall require that all material conveyed, transferred and unloaded possess adequate moisture content in order to minimize or eliminate visible emission of fugitive dust.
 - b. The permittee shall require that all unloading, transferring and conveying activities be performed in a manner that reduces the drop height to the maximum extent possible in order to minimize or eliminate visible emission of fugitive dust.

OPERATIONAL RESTRICTIONS

none

MONITORING AND/OR RECORD KEEPING REQUIREMENTS

1. The permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>Unpaved roadways and parking areas</u>	<u>minimum inspection</u>
<u>frequency</u>	
All roads	Once per shift

The purpose of the inspections is to determine the need for implementing the control measures specified. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations. 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 day.

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 minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations.

2. The permittee shall maintain records of the following information:
- a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. The dates the control measures were implemented; and
 - d. On a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
 - e. Annual quantity of fuel consumed (gallons) in the diesel electric generator based on daily and monthly records.
 - f. Annual quantity of limestone, gravel and sand unloaded for storage and sold (tons).

The information required in 2.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

3. The permittee shall perform inspections of the limestone, gravel and sand storage piles in accordance with the following frequencies: Once per shift

The purpose of the inspections is to determine the need for implementing additional control measures specified. The inspections shall be performed during representative, normal conditions. No inspection shall 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 minimize or eliminate visible emissions of fugitive dust generated by storage pile activities and to ensure compliance with the above-mentioned visible emission limitations. 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 day.

4. The permittee shall perform inspections of the limestone, gravel and sand transferring and conveying unloading equipment and activities in accordance with the following frequencies: Once per shift

The purpose of the inspections is to determine the need for implementing the additional control measures specified. The inspections shall be performed during representative, normal processing conditions. No inspection shall be necessary for equipment covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust generated by limestone, gravel and sand conveying and transferring and to ensure compliance with the above-mentioned visible emission limitations. 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 day.

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 within 30 days of the end of the calendar quarter to the appropriate Ohio EPA District office or Local Air Agency.
3. The permittee shall submit an annual deviation (excursion) report which identify exceedances of fuel consumption and limestone, gravel and sand unloading and sale limitation by February 15.
4. The permittee shall submit required reports in the following manner:
 - a. Reports of any required monitoring and/or record keeping 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 (1) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (2) the probable cause of such deviations, and (3) 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 30, April 30, July 30, and October 30 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.)

TESTING REQUIREMENTS AND COMPLIANCE METHOD DETERMINATION

1. Compliance with the emission limitations in the Air Emission Summary and in the Terms and Conditions for emission unit F001 shall be determined in accordance with the following methods:
 - a. Emission Limitation -PM: Visible particulate emission not to exceed 3 minutes per 60 minute observation period.

Applicable Compliance Method: Compliance with the emission limitations for the unpaved roadways and parking areas identified above shall be determined in accordance with test method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance

for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B) (4) (a) through (B) (4) (d) of OAC rule 3745-17-03.*

The procedures relating to Test Method 22 reflect the settlement agreement reached between Ohio EPA and the Ohio Electric Utilities concerning the Utilities appeal to the Ohio Environmental Review Appeals Commission of the 1991 revisions and additions to OAC chapter 3745-17. The revised rule containing the procedures was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the Ohio Electric Utilities have agreed to consider the procedures as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the procedures as a revision to the Ohio SIP for particulate matter.

b. Emission Limitation- PM: 1.22 tons PM/yr

Applicable Compliance Method: Multiply the USEPA, AP42, Section 13,5th edition published January 1995, emission factor obtained from the formula (0.186 for 4 wheeled trucks and 2.16 for 8 wheeled trucks) of lbs of PM/vehicle miles traveled by the annual truck vehicle miles traveled and control efficiency of (1-.85) watering as needed resurfacing with aggregate and divide by 2000 pounds per ton.

2. Compliance with the emission limitations in the Air Emission Summary and in the Terms and Conditions for emission unit F002 shall be determined in accordance with the following methods:

a. Emission Limitation- PM: Visible particulate emission not to exceed one minute during any sixty-minute observation period.

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

b. Emission Limitation- PM 0.83 tons PM/yr.

Applicable Compliance Method: Multiply the USEPA, AP42, Section 13,5th edition published January 1995, emission factor of 0.0098 lb PM/ton for the load in and load out activities for the limestone, gravel and sand storage pile obtained from the formula and 1.4 lb PM/acre/day by the appropriate through puts and pile size. Divide this total by 2000 pounds per ton. The storage piles particulate emission is multiplied by a control efficiency of (1-.85) damp wetted material and reduced drop height and the result is compared to the allowable.

3. Compliance with the emission limitations in the Air Emission Summary and in the Terms and Conditions for emission unit F003 shall be determined in accordance with the following methods:

a. Emission Limitation- 20 opacity percent as a six-minute average

Applicable Compliance Method: Visible particulate emission shall be determined in accordance with the procedures and methods

provided in OAC rule 3745-17-03(B) (1) and 40 CFR Part 60 Appendix A Method 9.

b. Emission limitation- 2.2 tpy PM

Applicable Compliance Method: Multiply the emission factor (0.0098 lb PM/ton of limestone, gravel and sand handled) obtained from the formula found in section 13.2.4 of USEPA publication title Air Pollutant Emission Factors dated July 1995 by the tons of limestone, gravel and sand handle per year and by 10 actual activities. Multiply this result by control efficiency of (1-.85)damp wetted material and reduced drop height and divide by 2000 pounds per ton. The result is compared to the allowable.

4. Compliance with the emission limitations in the Air Emission Summary and in the Terms and Conditions for emission unit P001 shall be determined in accordance with the following methods:

a. Emission Limitation - PM: 0.43 lb PM/hr

Applicable Compliance Method: Multiply the USEPA, AP-42, 5th edition published in January 1995 and updated October 1996, emission factor of 0.31 lb PM/MM Btu by maximum heat input of 1.4 MM Btu/hr.

b. Emission Limitation - PM: 0.93 ton PM/yr

Applicable Compliance Method: Multiply the emission factor provided above by the total annual million Btu heat input from the fuel combusted (gallons per year times 140,000 Btu/gallon divide by 1,000,000) per year and divide by two thousand pounds per ton.

c. Emission Limitation - NOx: 6.17 lbs NOx/hr

Applicable Compliance Method: Multiply the USEPA, AP-42, 5th edition published in January 1995 and updated October 1996, emission factor of 4.41 lb NOx/MM Btu by maximum heat input of 1.4 MM Btu/hr.

d. Emission Limitation - NOx: 13.27 tons NOx/yr

Applicable Compliance Method: Multiply the emission factor provided above by the total annual million Btu heat input from the fuel combusted (gallons per year times 140,000 Btu/gallon divide by 1,000,000) per year and divide by two thousand pounds per ton.

e. Emission Limitation - CO: 1.33 lbs CO/hr

Applicable Compliance Method: Multiply the USEPA, AP-42, 5th edition published in January 1995 and updated October 1996, emission factor of 0.95lb CO/ MM Btu by maximum heat input of 1.4 MM Btu/hr.

f. Emission Limitation - CO: 2.86 tons CO/yr

Applicable Compliance Method: Multiply the emission factor provided above by the total annual million Btu heat input from the fuel combusted (gallons per year times 140,000 Btu/gallon divide by 1,000,000) per year and divide by two thousand pounds per ton.

g. Emission Limitation - SO₂: 0.41 lb SO₂/hr

Applicable Compliance Method: Multiply the USEPA, AP-42, 5th edition published in January 1995 and updated October 1996, emission factor of 0.29 lb SO₂/MM Btu by maximum heat input of 1.4 MM Btu/hr.

h. Emission Limitation - SO₂: 0.87 ton SO₂/yr

Applicable Compliance Method: Multiply the emission factor provided above by the total annual million Btu heat input from the fuel combusted (gallons per year times 140,000 Btu/gallon divide by 1,000,000) per year and divide by two thousand pounds per ton.

i. Emission Limitation - VOC: 0.49 lb VOC/hr

Applicable Compliance Method: Multiply the USEPA, AP-42, 5th edition published in January 1995 and updated October 1996, emission factor of 0.35 lb VOC/MM Btu by maximum heat input of 1.4 MM Btu/hr.

j. Emission Limitation - VOC: 1.05 ton VOC/yr

Applicable Compliance Method: Multiply the emission factor provided above by the total annual million Btu heat input from the fuel combusted (gallons per year times 140,000 Btu/gallon divide by 1,000,000) per year and divide by two thousand pounds per ton.

k. Emission Limitation - Opacity: 20 % as 6-minute average for diesel engine

Applicable Compliance Method: Visible particulate emissions shall be determined in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

MISCELLANEOUS REQUIREMENTS

none