



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
FRANKLIN COUNTY**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08698

DATE: 1/02/2003

Ohio Mulch
Byron Brannon
4120 Roberts Rd
Columbus, OH 43228

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/02/2003
Effective Date: 1/02/2003**

FINAL PERMIT TO INSTALL 01-08698

Application Number: 01-08698
APS Premise Number: 0125042442
Permit Fee: **\$800**
Name of Facility: Ohio Mulch
Person to Contact: Byron Brannon
Address: 4120 Roberts Rd
Columbus, OH 43228

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

**4120 Roberts Rd
Columbus, Ohio**

Description of proposed emissions unit(s):

Mulch and storage piles.

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

Ohio Mulch
PTI Application: 01-08698
Issued: 1/02/2003

Facility ID: 0125042442

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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

Ohio Mulch
 PTI Application: 01-08698
 Issued: 1/02/2003

Facility ID: 0125042442

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>
PE	40

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>	OAC rule 3745-17-08 (B), (B)(2)
F001 - Paved roadways and parking areas (see Section A.2.a)	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07 (B)(4)	
	OAC rule 3745-17-08 (B), (B)(8), (B)(9)	
unpaved roadways and parking areas (see Section A.2.b)	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07 (B)(5)	

Applicable Emissions Limitations/Control Measures	visible emissions of fugitive dust (see Sections A.2.e through A.2.j)
Particulate emissions shall not exceed 1.0 ton per year.	less stringent than the above-mentioned visible emission limitation
no visible particulate emissions except for one minute during any 60-minute period	less stringent than the above-mentioned control measurement requirements
best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.c, A.2.d, and A.2.f through A.2.j)	
The emission limitation established pursuant to OAC rule 3745-31-05 is equivalent in stringency or more stringent than the emission limitation established by this rule.	
Particulate emissions shall not exceed 31.0 tons per year.	
No visible particulate emission except for 3 minutes during any 60-minute period	
Best available control measures that are sufficient to minimize or eliminate	

2. Additional Terms and Conditions

- 2.a** The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways:

all

paved parking areas:

all

- 2.b** The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways:

all

unpaved parking areas:

all

- 2.c** The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by water flushing at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.d** The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with water flushing at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.e** The permittee shall employ best available control measures on all unpaved roadways and

parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.f** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.g** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.h** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.i** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.j** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restrictions

None

Ohio Mulch

PTI Application: 01 09400

Issued

Facility ID: 0125042442

Emissions Unit ID: F001

C. Monitoring and/or Recordkeeping Requirements

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

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
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all	daily
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<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
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all	daily
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2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

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

E. Testing Requirements

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

- a. Emission Limitation:

No visible particulate emissions except for one minute during any 60-minute period

Compliance Method:

Compliance with the emission limitation for the paved and 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.

- b. Emission Limitation:

Particulate emissions shall not exceed 16.0 tons per year.

Compliance Method:

Unpaved areas

The emission factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.2 (September, 1998) shall be utilized to determine compliance. Initial compliance has been determined using inputs representing current conditions as follows:

$$E = \frac{k(s/12)^a(W/3)^b(365-p)/365}{(M/0.2)^c}$$

Where

E = size-specific emission factor (lb/VMT)

s = silt content of road surface material (%) = 6.4 %

W = mean vehicle weight (tons) = 15

M = surface material moisture content (%) = 0.2%

a = 0.8 (dimension less constant)

b = 0.5 (dimension less constant)

c = 0.4 (dimension less constant)

k = 10 (dimension less constant) particle size multiplier

p = 145 days/year with greater than 0.1 inch or precipitation

Therefore, E = 8.15 lbs particulate/VMT

Maximum travel = 15,334 VMT/year

(15,334 VMT/yr)(8.15 lbs/VMT) = 124,972 lbs of particulate/year

(124,972 lbs/year)(1 ton/2000 lbs) = 62.5 tons of particulate uncontrolled/year

Assume 50% control for roadway watering

(62.5 tons/year) (.50) = 31.2 tons of particulate controlled/year

Paved areas

The emission factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.1 (October, 2002) shall be utilized to determine compliance. Initial compliance has been determined using inputs representing current conditions as follows:

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

Where

E = size-specific emission factor (lb particulate /VMT)

k = particle size multiplier = 0.082 lb/VMT

sL = road surface loading = 3 g/m²

W = mean vehicle weight (tons) = 15 tons

Therefore, $E = 1.19 \text{ lbs particulate/VMT}$
Maximum travel = 2,558 VMT/year

$(2,558 \text{ VMT/yr})(1.19 \text{ lbs/VMT}) = 3,044 \text{ lbs of particulate/year}$

$(3,044 \text{ lbs/year})(1 \text{ ton}/2000 \text{ lbs}) = 1.5 \text{ tons of particulate uncontrolled/year}$

Assume 80% control for roadway watering
 $(1.5 \text{ tons/year}) (.20) = 0.30 \text{ tons of particulate controlled/year}$

Total particulate emissions from both unpaved and paved roadways and parking areas =
 $32.0 + 0.3 = 32.3 \text{ tons/yr}$

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - Material handling with load- in and load-out from storage piles (mulch, compost and soil)	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 7.9 tons per year. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See sections A.2.b, A.2.c and A.2.f.
	OAC rule 3745-17-07(B)(1)	Visible PE from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	The emission limitation established pursuant to OAC rule 3745-31-05 is equivalent in stringency or more stringent than the emission limitation established by this rule.
	OAC rule 3745-15-07	See section A.2.g.
Wind erosion from storage piles. See Section A.2.a for identification of storage piles.	OAC rule 3745-31-05(A)(3)	There shall be no visible PE except for a period of time not to exceed 1- minute during any 60-minute observation period from storage piles. Best available control measures that are sufficient to minimize or eliminate visible

Ohio Mulch

PTI Application: 01 09400

Issued

Facility ID: 0125042442

Emissions Unit ID: F002

emissions of fugitive dust.
See sections A.2.d through
A.2.f.

2. Additional Terms and Conditions

- 2.a** The storage piles that are covered by this permit and subject to the above-mentioned requirements are listed below:

Hardwood mulch piles;
Miscellaneous mulch piles;
Finished soil piles;
Brush pile;
Recycled bags of yard waste pile.

- 2.b** The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ inherent moisture to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c** The above-mentioned control measure shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure shall continue during any such operation until further observation confirms that use of the measure is unnecessary.

- 2.d** The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ inherent moisture to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.e** The above-mentioned control measure shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

- 2.f Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- 2.g The air contaminants emitted during material handling of yard waste and compost, as covered by this permit, shall not cause a public nuisance in violation of OAC rule 3745-15-07. Approval of this permit is based upon operation of this facility in a manner that reduces the generation of nuisance odors and particulate emissions. If the CDO determines through routine inspections or from responding to complaints that objectionable odors or particulate emissions are present, this facility shall begin immediately to address the odor and/or particulate emissions and pursue resolution in an expeditious manner. If the objectionable odors and/or particulate emissions continue to occur, then CDO will request Ohio Mulch to propose and implement a plan that will minimize or eliminate the objectionable odors and /or particulate emissions.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

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

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
Hardwood mulch piles	Daily, when operating
Miscellaneous mulch piles	Daily, when operating
Finished soil piles	Daily, when operating
Brush pile	Daily, when operating
Yard waste pile (grass clippings, leaves, etc.)	Daily, when operating

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

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
Hardwood mulch piles	Daily, when operating
Miscellaneous mulch piles	Daily, when operating
Finished soil piles	Daily, when operating
Brush pile	Daily, when operating
Yard waste pile (grass clippings,	Daily, when operating

leaves, etc.)

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

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
Hardwood mulch piles	Daily, when operating
Miscellaneous mulch piles	Daily, when operating
Finished soil piles	Daily, when operating
Brush pile	Daily, when operating
Yard waste pile (grass clippings, leaves, etc.)	Daily, when operating

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
6. The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
7. The permittee shall maintain records of the following information:
- 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;
 - The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - The dates the control measures were implemented; and

- d. On a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

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

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitations-
 PE shall not exceed 7.9 tons per year.

Applicable Compliance Method-

Compliance shall be determined by the summing the calculated emission for material handling of mulch and with those emissions resulting from stockpiling of mulch and soils using a RACM emission factor of 0.35 lb PE/ton wood times the maximum annual throughput. Compliance with the annual emissions limitation shall be based on record keeping in section C.6.

- i. Top soil:
 $(0.154 \text{ tons/hr}) \times (0.35 \text{ lb/ton}) = 0.055 \text{ lbs PM/hr}$
 $(0.055 \text{ lbs PM/hr}) \times (8,760 \text{ hrs/yr}) \times (1 \text{ ton}/2,000 \text{ lbs}) = 0.24 \text{ tons PM/yr}$
- ii. Mulch handling:
 $(0.22 \text{ tons/hr}) \times (0.35 \text{ lb/ton}) = 0.077 \text{ lbs PM/hr}$
 $(0.077 \text{ lbs PM/hr}) \times (8,760 \text{ hrs/yr}) \times (1 \text{ ton}/2,000 \text{ lbs}) = 0.33 \text{ tons PM/yr}$
- iii. Yard waste:
 $(4.6 \text{ tons/hr}) \times (0.35 \text{ lb/ton}) = 1.6 \text{ lbs PM/hr}$
 $(1.6 \text{ lbs PM/hr}) \times (8,760 \text{ hrs/ton}) \times (1 \text{ ton}/2,000 \text{ lbs}) = 7.1 \text{ tons PM/yr}$

- iv. The emission factor calculation for soil handling and storage in RACM, Section 2.1.2., Equation 1 shall be utilized to determine compliance. Initial compliance has been determined using inputs representing current conditions as follows:

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

EF = Emission factor for pound of particulate per ton of soil (lb/ton);

PE = 101

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

$$(0.34 \text{ lb particulate/ton}) \times (0.1541 \text{ tons/hr}) = 0.052 \text{ lbs/hr}$$

$$(0.052 \text{ lbs/hr}) \times (1 \text{ ton} / 2000 \text{ lbs}) \times (8760 \text{ hrs /yr}) = 0.23 \text{ tons /yr}$$

Total emissions from the sources noted above:

$$(0.24 \text{ tons/yr}) + (0.33 \text{ tons/hr}) + (7.1 \text{ tons/yr}) + (0.23 \text{ tons/yr}) = \underline{7.9 \text{ tons PM / yr}}$$

- a. Emissions limitation-
There shall be no visible particulate emissions except for a period of time not to exceed 1-minute during any 60-minute observation period from wind erosion of storage piles.

Applicable Compliance Method

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

- b. Emissions limitation-
Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method

Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 9 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.

F. Miscellaneous Requirements

None