



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: 01-08333

DATE: 3/22/2001

RKE Trucking Inc
Andrew Kelley
6305 Frost Rd
Westerville, OH 43082

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,

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

CC: USEPA

CDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 01-08333

Application Number: 01-08333
APS Premise Number: 0125042460
Permit Fee: **\$600**
Name of Facility: RKE Trucking Inc
Person to Contact: Andrew Kelley
Address: 6305 Frost Rd
Westerville, OH 43082

Location of proposed air contaminant source(s) [emissions unit(s)]:
NE corner I270
Columbus, Ohio

Description of proposed emissions unit(s):
4 - 18 wheeled dump trucks, rubber tire loader, skid loader, screening machine.

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

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

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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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
TSP (F001: material handling)	5.3
TSP (F002: paved roadway)	2.6
TSP (F002: unpaved roadway)	1.3
TSP (F003: storage piles/wind erosion)	6.2

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - Material handling including loading, unloading, screening, conveyors, and hoppers	OAC rule 3745-31-05 (A)(3)	<p>Particulate emissions shall not exceed 4.4 tons per year.</p> <p>The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-07 and OAC rule 3745-17-08.</p> <p>See II.A.2.a-b below.</p>
	OAC rule 3745-17-07 (B)	Visible emissions of fugitive dust shall not exceed 20% opacity as a 3 minute average, except as provided by rule.
	OAC rule 3745-17-08	The emission limitation specified in this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

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

Front end loader, hopper, vibrating screen, conveyor.

2.b 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>
All	Wet suppression

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

2.c 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.d 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 rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

- 1. Water shall be applied at all points necessary to ensure compliance with the visible emission limitations.

C. Monitoring and/or Recordkeeping Requirements

- 1. 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

2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 4.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit semiannual reports which (a) identify all days during which any abnormal visible fugitive particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible fugitive particulate emissions. These reports shall be submitted to the Director of the Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
Particulate emissions shall not exceed 1.4 tons per year.

Emissions Unit ID: F001

Applicable Compliance Method:

Compliance shall be demonstrated by summing the topsoil loading, unloading, screening, and conveying operations emissions.

The topsoil loading emissions are determined by multiplying the maximum capacity of 65,000 tons per year (permit application, 1/23/01) by the emission factor 0.004 lb/ton for loading operations (RACM, Table 2.1.4-3) and dividing by 2,000 pounds per ton. The topsoil unloading emissions are found by multiplying the maximum capacity of 65,000 tons per year by the emission factor 0.04 pound per ton (RACM, 2.1.3-1) and dividing by 2,000 pounds per ton.

Loading: $0.004 \text{ lb/ton} * 65,000 \text{ tons/yr} / 2,000 \text{ lbs/ton} = 0.13 \text{ ton/yr}$

Unloading: $0.04 \text{ lb/ton} * 65,000 \text{ tons/yr} / 2,000 \text{ lbs/ton} = 1.3 \text{ tons/yr}$

The screening emissions shall be demonstrated by multiplying the appropriate emission factor by the conversion factor of 2.11 to arrive at the appropriate TSP emission factor as specified in USEPA reference document AP-42, 11.19.2-2 (1/95). This emission factor is then multiplied by the hourly maximum production rate (application, 1/23/01) which is multiplied by the total number of hours in a year (8760) and divided by 2,000 pounds per ton to yield an emission limitation in tons per year.

emission factor * 2.1 = 0.001764 lb/ton

$0.001764 \text{ lb/ton} * 450 \text{ tons/hr} * 8760 \text{ hrs/yr} / 2,000 \text{ lbs/ton} = 3.5 \text{ tons/yr}$

Conveying along with hopper/feeder emissions shall be determined by multiplying the appropriate emission factor (AP-42 11.19.2-2, 1/95) by the conversion factor of 2.11 to yield the correct TSP emission factor. Accordingly, this emission factor is multiplied by the hourly maximum production rate (application, 1/23/01) which is multiplied by the total number of hours in a year (8760) and divided by 2,000 pounds per ton.

Hopper/feeder: emission factor * 2.11 = 0.0001008 lb/ton

$0.0001008 \text{ lb/ton} * 450 \text{ tons/hr} * 8,760 \text{ hrs/yr} / 2,000 \text{ lbs/ton} = 0.2 \text{ ton/yr}$

Conveying: emission factor * 2.11 = 0.0001008 lb/ton

$0.0001008 \text{ lb/ton} * 450 \text{ tons/hr} * 8,760 \text{ hrs/yr} / 2,000 \text{ lbs/ton} = 0.2 \text{ ton/yr}$

Total = $0.13 \text{ ton/yr} + 1.3 \text{ tons/yr} + 3.5 \text{ tons/yr} + 0.2 \text{ ton/yr} + 0.2 \text{ ton/yr} = 5.3 \text{ tons/yr}$

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity as a 3 minute average, except as provided by rule.

Applicable Compliance Method:

When necessary, compliance shall be demonstrated by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(3) using the methods and procedures specified in USEPA Reference Method 9.

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PTI A

Issued: 3/22/2001

Emissions Unit ID: **F001**

F. Miscellaneous Requirements

None

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>
F002 - Paved roadway	OAC rule 3745-31-05 (A)(3)
	OAC rule 3745-17-07 (B)(5)
	OAC rule 3745-17-07 (B)(4)
	OAC rule 3745-17-08 (B)(2)
	OAC rule 3745-17-08 (B), (B)(8), (B)(9)
Unpaved roadway	OAC rule 3745-31-05 (A)(3)

Applicable Emissions
Limitations/Control Measures

Particulate emissions shall not exceed 2.6 tons/yr.

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

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

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

Particulate emissions shall not exceed 1.3 tons/yr.

Visible emissions of fugitive dust shall not exceed 20% opacity as a 3 minute average, except as provided by rule.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.e

through A.2.j)

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

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:

Entrance/Exit

- 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:

Service road

- 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 truck, chemical suppression, sweeping, speed control and housekeeping 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 truck, chemical suppression, sweeping, speed control and housekeeping 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 water truck, chemical suppression, sweeping, speed control and housekeeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

Emissions Unit ID: **F002**

- 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

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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Entrance	Daily
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<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
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Service road	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 limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
Particulate emissions shall not exceed tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by utilizing the emission factor equation for unpaved roadways (AP-42 13.2.2-4): $E = [k (s/12)^a (W/3)^b / (M / 0.2)^c]$; and the emission factor equation for paved roadways (AP-42 13.2.1): $E = k (sL/2)^{0.65} (W/3)^{1.5}$. These equations yield the emission factors that are multiplied by the total vehicle miles traveled per year of both the paved and unpaved roadways and then divided by 2,000 lbs/ton. Finally, add the tons/yr of each of the paved and unpaved roadways to get the total tons per year.

Paved:

$$\text{TSP} - 0.082 * (3/2)^{0.65} * (16/3)^{1.5} = 1.31 \text{ lbs/VMT}$$

$$1.31 \text{ lbs/VMT} * 13,300 \text{ VMT/yr} / 2,000 \text{ lbs/ton} * [(100-70)/100] = 2.6 \text{ tons/yr}$$

Unpaved:

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Emissions Unit ID: **F002**

$$\begin{aligned} \text{TSP} - k &= 10 \quad s = 4.8 \quad a = 0.8 \quad W = 16 \quad b = 0.5 \quad M = 4.0 \quad c = 0.4 \\ 10 * (4.8/12)^{0.8} * (16/3)^{0.5} / (4.0/0.2)^{0.4} &= 3.35 \text{ lbs/VMT} \\ 3.35 \text{ lbs/VMT} * 2,660 \text{ VMT/yr} / 2,000 \text{ lbs/ton} * [(100-70)/100] &= 1.3 \text{ tons/yr} \end{aligned}$$

Total TSP emissions for paved and unpaved roadways and parking areas:
 $2.6 \text{ tons/yr} + 1.3 \text{ tons/yr} = 3.9 \text{ tons/yr}$

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>
F003 - Load-in and load-out of storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05 (A)(3)	No visible emissions except for one minute in any hour 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)
Wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05 (A)(3)	No visible emissions except for one minute in any hour 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)
Load-in and load-out of storage piles, and wind erosion from storage piles	OAC rule 3745-31-05 (A)(3)	Particulate emissions shall not exceed 6.2 tons/yr.
	OAC rule 3745-17-07 (B)(6)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-08 (B), (B)(6)	The emission limitation specified by

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RKE

PTI A

Issued: 3/22/2001

Emissions Unit ID: **F003**

this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

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:

Excavated storage piles

- 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 wet suppression by utilizing water trucks 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(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- 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 wet suppression by utilizing water trucks 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(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 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 rules 3745-17-08 and 3745-31-05.

RKE Trucking Inc
PTI Application: 01 00222
Issued

Facility ID: 0125042460

Emissions Unit ID: F003

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>
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All crushed soil storage piles (F004)	Daily
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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>
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All crushed soil storage piles (F004)	Daily
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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>
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All Crushed Soil Storage Piles (F004)	Daily
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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 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:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

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

D. Reporting Requirements

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

E. Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods :

Emission Limitation:

No visible emissions except for one minute in any hour.

Applicable Compliance Method:

If required, 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.

The permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in §60.672, including reports of opacity observations made using Method 9.

Emission Limitation:

Particulate emissions shall not exceed 6.2 tons/yr

Applicable Compliance Method:

Storage piles compliance shall be determined by using the emission factor equation (AP-42, 13.2.4, 1/95) and multiplying by the maximum annual production and dividing by 2,000 pounds per ton.

Wind erosion emissions compliance shall be determined by utilizing the emission factor equation (AP-42, 13.2.4, 1/95) and by multiplying by the surface area acres (application, 1/23/01) and by the total number of days in a year and dividing by 2,000 pounds per ton.

Storage piles: $K * 0.0032 * (U/5)^{1.3} / (M/2)^{1.4} = \text{lb/ton}$ (AP 42, 13.2.4, 1/95)

$K = 0.74 \text{ TSP}$ $U = 8.7 \text{ MPH}$ $M = 14\% \text{ moisture content of topsoil}$

$0.74 * 0.0032 * (8.7/5)^{1.3} / (14.0/2)^{1.4} = 0.018 \text{ lb/ton TSP}$

$0.018 \text{ lb/ton} * 65,000 \text{ ton/yr} * 1/2,000 \text{ lbs/ton} = 0.59 \text{ ton/yr}$

Wind erosion: $1.79 * S^{1.5} * (365-P) / 235 * 30/15 = \text{lb/day acre}$ (AP 42, 13.2.4, 1/95)

$1.79 * 9.2^{1.5} * (365-130) / 235 * 30/15 = 21.96 \text{ lbs/day/acre}$

$21.96 \text{ lbs/day acre} * 5.00 \text{ acres} * 365 \text{ days/yr} * 1/2,000 \text{ lbs/ton} = 20.0 \text{ tons/yr}$

Total particulate emissions for storage piles and wind erosion (controlled):

$(0.59 \text{ ton/yr} + 20.0 \text{ tons/yr}) * 0.3 = 6.2 \text{ tons/yr}$

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 01-08333 Facility ID: 0125042460

FACILITY NAME RKE Trucking Inc

FACILITY DESCRIPTION up to 10 - 18 wheeled dump trucks, rubber tire loader, skid loader, screening machine CITY/TWP Columbus

SIC CODE 4212 SCC CODE 3-05-010-30 EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION Material handling including loading, unloading, screening, conveyors, and hoppers

DATE INSTALLED March 31, 2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment		5.3		5.3
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Emission limitation of 5.3 tons/yr and wet suppression

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES x NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SC

PTI Num

FACILITY

FACILITY DESCRIPTION

up to 10 - 18 wheeled dump trucks, rubber
tire loader, skid loader, screening machine

CITY/TWP

Emissions Unit ID: **F001** _____

Columbus