State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **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: 01-08385

DATE: 2/20/2003

Ohio Soil Recycling LLC
Christian Elliot
Post Office Box 9447
Bexley, OH 43209

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

cc: **USEPA** **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 2/20/2003**
Terms and Conditions **Effective Date: 2/20/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08385

Application Number:	01-08385
APS Premise Number:	0125042465
Permit Fee:	**$400**
Name of Facility:	Ohio Soil Recycling LLC
Person to Contact:	Christian Elliot
Address:	Post Office Box 9447 Bexley, OH 43209

Location of proposed air contaminant source(s) [emissions unit(s)]:
2000 Integrity Drive S
Columbus, **Ohio**

Description of proposed emissions unit(s):
modification.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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

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 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter

3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(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

Pollutant	Tons Per Year
PM	37.6
OC	12.5

Emissions Unit ID: **F001**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F001 - Unpaved roadway and working pad	OAC rule 3745-31-05(A)(3)	Particulate emissions shall not exceed and 3.15 tons per year. There shall be no visible particulate emissions except for a period of three minutes during any 60 minute observation period from an unpaved roadway. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b and A.2.c and A.2.e through A.2.i)
	OAC rule 3745-17-07(B)(4)	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 rules 3745-17-08(B), (B)(8), (B)(9)	The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The unpaved roadway and working pad areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

<u>unpaved roadways:</u>

Plant roadway and parking area
Treatment pad

2.b The permittee shall employ best available control measures on the unpaved roadways and working pad 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 roadway, parking area and treatment pad with a broken concrete stabilized surface and periodic water application to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c 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.d 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.e 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.f 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.g 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 3745-17-08.

2.h The use of used oil as a dust suppressant is prohibited per OAC rule 3745-279-82.

B. Operational Restrictions

1. A maximum speed limit of 10 miles per hour for vehicular traffic shall be posted and enforced on the roadways and working pad areas of this facility.

2. The permittee shall stabilize unpaved roadway and working pad areas with compressed concrete.

3. The permittee shall water unpaved surfaces at a minimum of once per day, or as needed.

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:

Unpaved roadways and parking areas	Minimum inspection frequency
Plant Roadway and parking area	Daily
Treatment pad area	Daily

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 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.

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.

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.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation-
Particulate emissions from unpaved roadways and working pad areas shall not exceed 3.15 tons/yr.

Applicable Compliance Method-

Compliance shall be determined by multiplying the vehicle travel miles per year times a calculated Ohio RACM emission factor and a control efficiency for dust suppression:

Ohio RACM Section 2.1.1:

EF = (P)(0.81)(s)(S/30)(365-W)/(365)(T/4)E lbs/VMT
P = particle fraction that remains in suspension(0.62)
s = surface material silt content = 12% (RACM)
S = average vehicle speed = 10 mph
W = days with 0.01 inch or more of precipitation = 120 Climatic Atlas of US
T = number of tires 4
E = Extra tire width 2.5 (End loader)

EF = (0.62)(0.81)(12)(0.33)(0.67)(1)(2.5) = 3.3 lbs/VMT
Miles traveled = 5,411.25 miles (end loader)
E = (3.33 lbs/VMT)(5,411.25 miles/yr) * 1 ton/ 2,000 lbs = 9.0 tons PM/yr
Control efficiency = 50% watering; 30% concrete stabilization
9.0 tons/yr * (1 - 0.5) * (1 - 0.3) = 3.15 tons PM/yr

c. Emission limitation-

There shall be no visible emissions except for a period not to exceed three-minutes during any sixty-minute observation period from unpaved roadways..

Applicable Compliance Method-
Compliance with the emission limitation for the unpaved roadways and parking areas 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.

F. Miscellaneous Requirements

None

Emissions Unit ID: **F002**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F002 - Material handling - petroleum contaminated soil (PCS) multi-blend mixing machine (38 ton/hr)	OAC rule 3745-31-05(A)(3)	Particulate emissions shall not exceed 30 pounds per hour and 18.75 tons per year. (See section B.1) Organic compound emissions shall not exceed 30 pounds per hour and 12.5 tons per year. (See section B.1) Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See sections A.2.b through A.2.d). Compliance with this rule also includes compliance with the provisions of OAC rule 3745-17-07(B)(1).
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity, as a three-minute average, as determined in accordance with paragraph (B)(3) of OAC rule 3745-17-03.

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:

Multi-blend mixing machine

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:

material handling operations	control measures
Multi-blend mixing machine	inherent moisture in soils and wood chips

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 rule 3745-31-05.

B. Operational Restrictions

1. The permittee shall ensure that PCS is handled and stored in such a manner so that any storm water run off shall be contained, captured and disposed of according to applicable state and federal rules and regulation.

2 For the purposes of this permit, definitions of terms shall be the same as found in OAC rule 1301:7-9-16(B) and the permittee shall comply with provisions for disposal of PCS soils

specified in OAC rule 1301:7-9-16(H).

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:

material handling operations	minimum inspection frequency
Multi-blend mixing machine	daily, while in operation

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, 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.

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

   a. a record of the date and weight of each PCS load received with the corresponding results of analysis for TPH and/or BETX concentration in soils received;

   b. a record of the date and loads of soils removed from the windrow pile with corresponding TPH and/or BETX concentration in soils determined to be less than threshold level for clean soils.

   A copy of the above required information shall be maintained on file at the facility for a period of three years and shall be made available to the Ohio EPA Central District Office, upon request.

6. The permit to install for this emissions unit F002 was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this

emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Gasoline
TLV (mg/m3): 890
Maximum Hourly Emission Rate (lbs/hr):***3***0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): ***14***,700
MAGLC (ug/m3): 21,190

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency;

   b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

   The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit, as specified in Part I.A.2.

2. The permittee shall submit an annual reportof the calculated organic compound emissions based on the product of the volatilization rate times the tons of soils processed at the corresponding TPH and/or BETX concentration. These reports shall be submitted by January 31 of each year in accordance with the reporting requirements of the General Terms and Conditions of this permit, as specified in Part I.A.2.a..

E. Testing Requirements

1. Compliance with the emission limitations in this permit for emissions unit F002 shall be determined in accordance with the following method(s):

   a. Emission Limitation-
   Particulate emissions shall not exceed 30 pounds per hour and 18.75 tons per year.

   Applicable Compliance Method-
   Compliance shall be determined by calculation at the maximum annual weight of 100,000

tons of soil and 25,000 tons of woodchips using an emission factor of 0.3 pounds particulate emission per ton of sand - RACM Table 2.1.3.-2:

0.3 lbs PM/ton * 100 tons per hour = 30 lbs PM/hr
0.3 lbs PM/ton * 125,000 tons per year * 1 ton/2,000 pounds = 18.75 tons PM/year

b. Emission Limitation-
OC emissions shall not exceed 30 pounds per hour and 12.5 tons per year.

Applicable Compliance Method-
Compliance with the hourly limitation shall be determined by calculation at the actual maximum blending weight of 38 tons PCS soil/hr and at a 40% volatilization rate determined by mass balance testing, times the maximum corresponding concentration of TPH and/or BETX in soils processed:

38 tons PCS soil/hr * (1,000 TPH/1,000,000 soil * 0.4) * 2,000 lb/1 ton = 30 lbs OC/hr

Compliance with the annual limitation shall be determined by calculation using the weight of PCS received monthly, as recorded in section C.5, with the corresponding TPH content in parts per million (PPM) times the 40% volatilization rate.

For example, 32,000 tons PCS soil/yr * (1,000 TPH/1,000,000 soil * 0.4) = 12.5 tons OC/yr

c. Emission Limitation-
Visible PE of fugitive dust from the multi-blend machine shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method-
If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

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.

Operations, Property, and/or Equipment		Applicable Rules/Requirements
F003 - Load-in and load-out of compost piles.	Load-in and load-out of storage piles, and wind erosion from compost piles	OAC rule 3745-31-05(A)(3)
Wind erosion from compost piles (see section A.2.a for identification of piles)		OAC rule 3745-31-05(A)(3)

	Applicable Emissions Limitations/Control Measures	by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	There shall be no visible emissions from compost piles, except for one minute during any sixty-minute period.	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 3745-17-07(B)(6)	Best available control measures shall be employed 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 3745-17-08 (B), (B)(6)	Particulate emissions from soils load-in shall not exceed 14 tons per year. see section A.2.a for identification of storage piles. Organic compound emissions shall not exceed 2.5 tons per year. There shall be no visible emissions from compost pile wind erosion, except for a period of time not to exceed 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 Particulate emissions from wind erosion from storage piles shall not exceed 1.7 tons per year. The emission limitation specified	

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:

PCS/woodchip windrow
Treated soils stockpile

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 windbreaks 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 measures 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures 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 wind breaks and cover windrows and stockpiles with tarps 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 measures 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures 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.

B. Operational Restrictions

1. The treatment windrows and PCS storage piles shall be covered with tarps, within 4 hours after formation.

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:

storage pile identification	minimum load-in inspection frequency
PCS/woodchip windrow	daily
Treated soils stockpile	daily

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

storage pile identification	minimum load-out inspection frequency
PCS/woodchip windrow	daily
Treated soils stockpile	daily

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

storage pile identification	minimum wind erosion inspection frequency
PCS/woodchip windrow	daily
Treated soils stockpile	daily

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

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

6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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

   a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

   b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

   c. the dates the control measures were implemented; and

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

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

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

   b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in this permit for emissions unit F003 shall be determined in accordance with the following method(s):

a. Emission Limitation-
Particulate emissions from soil piles shall not exceed 14 tons per year.

Applicable Compliance Method-
Compliance shall be determined by calculation at the maximum annual weight of 100,000 tons of soil and 25,000 tons of woodchips using an emission factor of 0.323 pound particulate emission per ton of composted soil - RACM Equation 2.1.2.-1:

EF = 0.33/(PE/100)2 gross estimate of fugitive dust expected from aggregate storage piles
EF = emission factor for lbs/ton placed in storage, and
PE = Thornthwaite's precipitation-evaporation index (101 from RACM table 2.1.2-1))
CE = Control efficiency equals 30% for wind breaks
0.323 lbs PM/ton * 125,000 tons soil * (1 - 0.3) * 1 ton/2,000 lbs = 14 ton PM/yr

b. Emission Limitation-
Organic compound emissions shall not exceed 2.5 tons per year.

Applicable Compliance Method-
Compliance shall be determined by calculation at the annual process weight of PCS soils handled and a 1.25 % volatilization rate or that rate determined by mass balance testing, times the corresponding concentration of BETX in soils handled.

c. Emission Limitation-
There shall be no visible emissions from storage piles except for one minute during any sixty-minute period.

Applicable Compliance Limitation-
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.

d. Emission Limitation-
Particulate emissions from wind erosion from storage piles shall not exceed 1.7 tons per year.

Applicable Compliance Method-
Compliance shall be determined by calculation at the maximum annual weight of 100,000 tons of soil and 25,000 tons of woodchips using an emission factor of 760 pounds particulate emission per acre SCC 3-05-010-49 AP-42 wind erosion surface mining operations:

Area = 4.5 acres
Control efficiency = 0%
4.5 acres * 760 pounds per acre * 1 ton/2,000 lbs = 1.7 tons/year

F. Miscellaneous Requirements

None