



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MORROW COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-12236

Fac ID: 0159000169

DATE: 5/6/2008

Complete Clearing, Inc.
Kevin Farson
510 Industrial Way
Marengo, OH 43334

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 5/6/2008
Effective Date: 5/6/2008**

FINAL PERMIT TO INSTALL 01-12236

Application Number: 01-12236
Facility ID: 0159000169
Permit Fee: **\$200**
Name of Facility: Complete Clearing, Inc.
Person to Contact: Kevin Farson
Address: 510 Industrial Way
Marengo, OH 43334

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

**510 Industrial Way
Marengo Ohio, Ohio**

Description of proposed emissions unit(s):

Tub Grinder with 1000 Hp diesel engine.

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

Chris Korleski
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 (i.e., postmarked) quarterly 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

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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)

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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.

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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.

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>
NO _x	15.41
PE	9.18
SO ₂ (potential to emit)	5.91
CO	3.32

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OC (potential to
emit)

7.14

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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 -(P001) - Portable Tub Grinder, 1000 H.P. diesel engine; processed mulch piles; loading and unloading activities associated with a tub grinder

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)	Nitrogen oxides (NO _x) emissions from the diesel engine shall not exceed 20.54 pounds per hour (lb/hr). See Section A.2.a below. Compliance with this rule also includes compliance with OAC rule 3745-31-05(C) and OAC rule 3745-31-05(A)(3)(b).
OAC rule 3745-31-05(C) (Voluntary restriction to avoid BAT), (Voluntary restriction to avoid modeling)	See Section A.2.b, and A.2.c below.
OAC rule 3745-31-05(A)(3)(b)	See Section A.2.d and B.1 below.
OAC rule 3745-17-07(A)(1)	Visible PE from the exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
OAC rule 3745-17-07(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	Visible PE from fugitive dust shall not exceed 20% opacity as a 3-minute average, except as provided by rule.

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OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The permittee shall employ reasonably available control measures for the tub grinder, processed mulch pile(s), and the loading and unloading activities associated with the tub grinder for the purpose of preventing fugitive dust from becoming airborne.
OAC rule 3745-17-11(B)(5)(b)	PE emissions from the large bore stationary engine exhaust shall not exceed 0.062 lb per MMBtu of actual heat input.
OAC rule 3745-18-06(G)	See Section A.2.e below.
40 CFR Part 63, Subpart ZZZZ	See Section A.2.f below.

2. Additional Terms and Conditions

- 2.a** The pounds per hour limit for NO_x for the tub grinder's diesel engine reflects the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** Permit to Install 01-12236 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
- i. maximum operating hours of 1,500 hours per rolling, 12-month period;
 - ii. the application of water to material handling operations, as needed to prevent the generation of fugitive emissions;
 - iii. Emissions from the diesel engine shall not exceed the following rate:
 - NO_x emissions shall not exceed 15.41 tons per rolling, 12-month period.
 - PE shall not exceed 1.08 tons per rolling, 12-month period
 - CO emissions shall not exceed 3.32 tons per rolling, 12-month period.
 - iv. PE from the tub grinder and associated material handling operations

Emissions Unit ID: **P001**

shall not exceed 8.10 tons per rolling, 12-month period.

The rolling, 12-month NO_x, PE and CO emissions limitations for this emissions unit were established to reflect the potential to emit taking into account the 1,500 hours per rolling, 12-month maximum operating hours limitation. Therefore, compliance with the rolling, 12-month NO_x, PE and CO emissions limitations can be assumed as long as the rolling, 12-month maximum operating hours limitation is not exceeded.

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

- 2.c** This emissions unit shall not cause a nuisance per Ohio Administrative Code 3745-15-07.
- 2.d** The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) do not apply to the sulfur dioxide (SO₂) and organic compound (OC) emissions from this air contaminant source because the uncontrolled potential to emit for SO₂ and OC is less than 10 TPY.
- 2.e** Stationary internal combustion engines which have rated heat input capacities equal to, or less than, ten MMBtu per hour total rated capacity are exempt from paragraph (G) of OAC rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.
- 2.f** This unit is not located at a facility that is a major source of HAP emission and does not have to meet the requirement of 40 CFR Part 63, Subpart ZZZZ, and 40 CFR Part 63, Subpart A, including the initial notification requirement specified in 40 CFR 63.6645(d).

B. Operational Restrictions

1. The diesel engine shall be operated with diesel fuel with a sulfur content not greater than 0.5% by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit.
2. For each day during which the permittee burns a fuel other than diesel fuel with a sulfur

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content not greater than 0.5% by weight in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

3. The permittee shall maintain monthly records of the following information:
 - a. The total number of hours of operation during each month.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the number of hours of operation, calculated by adding the current month's number of hours of operation to the number of hours of operation for the preceding eleven calendar months.
4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

5. 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:

Emissions Unit ID: P001

material handling operation

minimum inspection frequency

Tub Grinder

Daily, when operating

Mulch piles

Daily, when operating

Loading and unloading

Daily, when operating

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

6. The permittee shall record the following information in a log for each operation (i.e., tub grinder, processed mulch pile(s), and the loading and unloading activities associated with the tub grinder) at the minimum inspection frequency specified above (or as modified) whenever the emissions unit is in operation:
- a. the date and time of each observation;
 - b. the presence or absence of any visible emissions and whether the emissions are representative of normal operations;
 - c. whether it was determined by the permittee that it was necessary to implement the control measures;
 - d. the dates and times the control measures were implemented; and,
 - e. the name of the person reporting each observation.

The operations log shall be maintained on site.

7. 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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any of the following occurrences:
- a. each day when visible emissions were observed, and at which location;

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- b. each day during which an inspection was not performed at the required frequency;
- c. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
- d. all exceedances of the rolling, 12-month operating hours limitation; and
- e. each day when a fuel other than 0.5% sulfur diesel fuel was burned in this emissions unit.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month periods.

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:

Visible PE from the exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Issued: 5/6/2008Applicable Compliance Method:

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

c. Emission Limitation:

NO_x emissions from the diesel engine shall not exceed 20.54 lb/hr and 15.41 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the lb/hr limitation shall be demonstrated by the following equation:

$$\text{lb NO}_x \text{ emissions per hour} = E_f * O_p * H_v$$

where,

E_f = Emission factor from AP-42 Table 3.3-1 (4.41 lb NO_x/MMBtu);

O_p = Maximum engine operating rate (34 gal/hr); and

H_v = Heating value of diesel fuel (0.137 MMBtu/gal)

Compliance with the rolling, 12-month limitation shall be demonstrated by multiplying the above lb/hr limitation by the rolling, 12-month summation of the number of hours of operation required in Section C.3.b and converting to tons.

If required, emissions testing shall be conducted using the following test method

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in order to demonstrate compliance with the allowable hourly NO_x emission limitation: 40 CFR Part 60, Appendix A, Method 7 or 7E. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Central District Office.

Issued: 5/6/2008d. Emission Limitation:

CO emissions from the diesel engine shall not exceed 3.32 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum lb/hr emission rate by the rolling, 12-month summation of the number of hours of operation required in Section C.3.b and converting to tons. The maximum lb/hr emission rate shall be established by the following equation:

$$\text{maximum lb CO emissions per hour} = E_f * Op * Hv$$

where,

E_f = Emission factor from AP-42 Table 3.3-1 (0.95 lb CO/MMBtu);

Op = Maximum engine operating rate (34 gal/hr); and

Hv = Heating value of diesel fuel (0.137 MMBtu/gal)

If required, emissions testing shall be conducted using the following test method in order to demonstrate compliance with the allowable CO emission limitation: 40 CFR Part 60, Method 10, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Central District Office.

e. Emission Limitation:

PE from the diesel engine shall not exceed 1.08 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum lb/hr emission rate by the rolling, 12-month summation of the number of hours of operation required in Section C.3.b and converting to tons. The maximum lb/hr emission rate shall be established by the following equation:

$$\text{maximum lb PE per hour} = E_f * Op * Hv$$

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where,

E_f = Emission factor from AP-42 Table 3.3-1 (0.31 lb PE/MMBtu);

Op = Maximum engine operating rate (34 gal/hr); and

Hv = Heating value of diesel fuel (0.137 MMBtu/gal).

If required, emissions testing shall be conducted using the following test method in order to demonstrate compliance with the allowable PE emission limitation: 40 CFR Part 60, Method 5, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Central District Office.

f. Emission Limitation:

PE from the tub grinder and associated material handling operations shall not exceed 8.10 tons per rolling, 12-month period.

Applicable Compliance Method:

The PE limitation for the tub grinder and for loading and unloading of wood materials and processed mulch piles was established by multiplying two emission factors from Ohio EPA's "Reasonably Available Control Measures for Fugitive Dust Sources" (RACM Table 2.17-1) by the maximum hourly process weight rate (potential wood weight shredded per hour). An emission factor of 0.35 lb of PE per ton of material shredded and an emission factor of 1.0 lb PE per ton of wood waste stored, i.e., for the storage piles and loading/unloading operations, was applied in the following calculations of emissions. Since these emission factors do not include rain days and watering control measures, a conservative estimate of 80% control was used to estimate these reductions in emissions.

Compliance shall be demonstrated by multiplying the maximum lb/hr emission rate by the rolling, 12-month summation of the number of hours of operation required in Section C.3.b and converting to tons. The maximum lb/hr emission rate shall be established by the following equations:

Maximum lb PE per hour = maximum lb PE per hour from grinding + maximum lb PE per hour from processed mulch and wood storage piles, loading and unloading operations

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where,

Maximum lb PE per hour from grinding = $(0.35 \text{ lb PE/ton of wood}) * (8,000 \text{ lbs wood/hour}) * (\text{ton}/2000 \text{ lbs}) * (1-0.8) = 2.8 \text{ lb PE/hour}$; and

Maximum lb PE per hour from processed mulch and wood storage piles, loading and unloading operations = $(1.0 \text{ lb PE/ton of wood}) * (8,000 \text{ lbs wood/hour}) * (\text{ton}/2000 \text{ lbs}) * (1-0.8) = 8.0 \text{ lbs PE/hour}$.

g. Emission Limitation:

PE emissions from the large bore stationary engine exhaust shall not exceed 0.062 lb per MMBtu of actual heat input.

Emissions Unit ID: **P001**Applicable Compliance Method:

The PE emissions limitation for the large bore engine was set at that required by rule, OAC rule 3745-17-11 (B)(5)(b). If required, emissions testing shall be conducted using the following test method in order to demonstrate compliance with the allowable PE emission limitation: 40 CFR Part 60, Method 5, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Central District Office.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable source may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable source shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:
 - a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
 - i. the portable source is equipped with the best available technology for such portable source;
 - ii. the portable source is operating pursuant to a currently effective permit to install, permit to operate (PTO), or registration status;
 - iii. the applicant has provided proper notice of the intent to relocate the portable source to the (1.) Ohio EPA District Office or local air agency responsible for the permit(s) for the source and (2.) the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and
 - iv. in the judgement of the Ohio EPA District Office or local air agency having jurisdiction over the new site, the proposed site is acceptable under OAC rule 3745-15-07.
 - b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable source may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:
 - i. the portable source permittee possesses an Ohio EPA PTI, PTO, or registration status;

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- ii. the portable source is equipped with best available technology;
 - iii. the portable source owner has identified the proposed site to Ohio EPA;
 - iv. Ohio EPA has determined that the portable source, at the proposed site, will have an acceptable environmental impact;
 - v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
 - vi. the owner of the proposed site has provided the portable source owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable source to this proposed site; and
 - vii. the portable source owner has provided Ohio EPA with 15 days written notice of the relocation.
- c. Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.
- d. In order for the permitting Ohio EPA District Office or local air agency and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable source must file a " Notice of Intent to Relocate" within the specified time frame (30 or 15 days), prior to the relocation of the portable source with the Ohio EPA District Office or local air agency responsible for the permits for the source and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Upon receipt of the notice, the Ohio EPA District Office or local air agency responsible for the permits for the portable source, and/or appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

Pursuant to OAC rule 3745-31-05(F), the director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

Emissions Unit ID: **P001**

2. The voluntary restrictions listed in Part II Section A.2.b of this permit are equivalent to Best Available Technology (BAT) for this emissions unit, thereby allowing the portable source to meet the criteria associated with the relocation of a portable source.