



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
PICKAWAY 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: 01-12156

Fac ID: 0165000144

DATE: 6/26/2007

Sarasota Transport LLC
Martin Savko
4636 Shuster Road
Columbus, OH 43214

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: 6/26/2007
Effective Date: 6/26/2007**

FINAL PERMIT TO INSTALL 01-12156

Application Number: 01-12156
Facility ID: 0165000144
Permit Fee: **\$400**
Name of Facility: Sarasota Transport LLC
Person to Contact: Martin Savko
Address: 4636 Shuster Road
Columbus, OH 43214

Location of proposed air contaminant source(s) [emissions unit(s)]:
**9775 Ashville Pike
Lockbourne, Ohio**

Description of proposed emissions unit(s):
CAT generator

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>
PM	3.7
NOx	51.2
CO	11.1
SO2	3.4
OC	4.1

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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 -(P961) - Portable Internal Combustion Engine: 377 horsepower,4-stroke, diesel-fired (installed March 2001)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Nitrogen oxides (NO_x) emissions shall not exceed 11.8 pounds per hour and 51.2 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 2.52 pounds per hour and 11.1 tons per year.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.8 pounds per hour and 3.4 tons per year.</p> <p>Organic compound (OC) emissions shall not exceed 1.0 pounds per hour and 4.1 tons per year.</p> <p>Particulate matter 10 microns or less in size (PM₁₀) emissions shall not exceed 0.9 pounds per hour and 3.7 tons per year.</p> <p>Visible particulate emissions (PE) shall not exceed 10% opacity, as a 6-minute average, except during start-up and shutdown.</p>
OAC rule 3745-16-1(F)(3)	See A.2.a
OAC rule 3745-17-11(B)	See A.2.b
OAC rule 3745-17-07(A)	See A.2.c
OAC rule 3745-18-06(G)	See A.2.d
OAC rule 3745-17-07(B)	See A.2.e
OAC rule 3745-17-08(B)	See A.2.e
OAC rule 3745-21-07 (B)	See A.2.f

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OAC rule 3745-21-08 (B)

See A.2.g

2. Additional Terms and Conditions

- 2.a** The hourly and annual emission limitations for this emission unit were established to reflect the maximum potential to emit. It is not necessary to develop additional monitoring, record keeping and / or reporting requirements to ensure compliance with these limits.
- 2.b** The minimum stack height demonstrated by a fluid model which ensures that the emissions from the stack do not result in excessive concentrations of any air contaminants as a result of atmospheric downwash, wakes or eddy effects created by the source itself, nearby structures or nearby terrain features is 27.5 feet above ground level.
- 2.c** 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.d** This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).
- 2.e** This emissions unit is a portable source and is applicable to the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08. Best Available Technology (BAT) for this emissions unit, as set forth by the requirements/emissions limitations of this permit under OAC 3745-31-05(A)(3) are more stringent than any requirements/emissions limitations as may be applicable under OAC 3745-17-07(B) and OAC 3745-17-08(B).
- 2.f** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs

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and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. Operational Restrictions

1. The minimum stack height for the diesel generator exhaust stack shall be 27.5 feet above ground level.
2. The permittee shall combust only diesel fuel with a sulfur content of no more than 0.5 weight percent sulfur in this emission unit.

C. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than diesel, the permittee shall maintain a record of the type and quantity of fuel burned in this emission unit.
2. The permittee shall maintain records of fuel supplier certification to demonstrated compliance with the operational restriction in B.2 (above). Records of fuel supplier certification shall include the following information:
 - a. the name of the fuel supplier; and
 - b. a statement from the fuel supplier that the fuel is in compliance with the operational restriction in B.2 (above).

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the sulfur content fuel restriction specified in B.2 (above). These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission limitation:
 - 11.7 lbs nitrogen oxides (NO_x) per hour
 - 2.52 lb carbon monoxide (CO) per hour

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0.8 lb sulfur dioxide (SO₂) per hour
1.0 lb organic compounds (OC) per
0.9 lb particulate matter 10 microns or less in size (PM₁₀) per hour

Applicable compliance method:

These hourly emission limitations represents the potential to emit for this emissions unit using AP-42 Table 3.3-1 emission factors and an engine rating of 377 h.p. They were calculated by multiplying the emissions factor for each pollutant by the maximum horsepower output of the engine.

- b. Emission limitation:
51.2 tons NO_x per year
11.1 tons CO per year
3.4 tons SO₂ per year
4.1 tons OC per year
3.7 ton PM₁₀ per year

Applicable compliance method:

The annual emission limitations above were established by multiplying the hourly emission limitation for each pollutant above by 8760 hour per year and then dividing by 2000 pounds per ton. Provided compliance is shown with the hourly mass emissions limitations, compliance with the annual limitation shall be assumed

- c. Emission limitation:
Visible particulate emissions (PE) shall not exceed 10% opacity, as a 6-minute average, except during start-up and shutdown.

Applicable compliance method:

If required, compliance shall be demonstrated using Method 9 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

1. The permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI) providing the appropriate exemption requirements have been met and following the approval of the director. The director may issue a "Notice of Site Approval" if the portable source meets the following criteria pursuant to OAC rule 3745-31-03(A)(1)(p)(i):

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- a. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination and state and/or federal rules;
- b. the portable source is operating pursuant to a currently effective PTI and/or any applicable permit to operate (PTO) and continues to comply with the requirements of the permit;
- c. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation*;
- d. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance in violation of OAC rule 3745-15-07; and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site; and
- e. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the emissions of nitrogen dioxide at the fence line will not exceed the Ohio Acceptable Incremental Impact of $12.5 \mu\text{g}/\text{m}^3$ on an annual basis using a standard fluid model.
- f. the director has issued a "Notice of Site Approval", stating that the proposed site is acceptable under OAC rule 3745-15-07 and the relocation will not result in the installation of a major stationary source or a modification of an existing major stationary source, and'

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

* Even if notification of the proposed relocation is submitted 30 days prior to the scheduled relocation date, the emissions unit shall not be moved prior to receiving the "Notice of Site Approval".

2. The NO_x emissions comply with the Ohio Acceptable Incremental Impact of $12.5 \mu\text{g} / \text{m}^3$ based on a stack height of 27.5 feet above ground level and a distance to the nearest fence line of 1000 feet. Modifications to this permit may be required if the stack

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height or fence line distance are decreased.