Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

10/7/2010

Mr. Christopher James
Crestline Paving & Excavating
PO Box 3356
Toledo, OH 43607

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448011904
Permit Number: P0106680
Permit Type: Initial Installation
County: Lucas

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
TDES; Michigan; Indiana; Canada

Lucas County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Crestline Paving & Excavating

Issue Date: 10/7/2010
Permit Number: P0106680
Permit Type: Initial Installation
Permit Description: 300 HP Diesel Engine
Facility ID: 0448011904
Facility Location: Crestline Paving & Excavating
1913 Nebraska Ave,
Toledo, OH 43607
Facility Description: Crushed and Broken Limestone Mining and Quarrying

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Danny Pittman at Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604 or (419)936-3015. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Permit Strategy Write-Up

1. Check all that apply:

   ___ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   Crestline Paving has a home office located at 1913 Nebraska Avenue, Toledo, Ohio. The company currently has a portable aggregate processing plant (0448950003, PTI 04-01446) and associated portable diesel engines (0448960007 through 0448960009, PTI 04-1450 through 04-1452, respectively) located at the 5010 Stickney Avenue, Toledo, Ohio facility. The company has installed a 413 hp (2.89 mmBTU/hr) portable diesel engine (manufactured 1991) and a 300 hp (2.10 mmBTU/hr) portable diesel engine (manufactured 1991) to provide power to the aggregate processing plant currently located at the Stickney Avenue facility. Under current Ohio EPA policy, the two proposed engines will be permitted under separate facility IDs because they are portable units. This permit is for the 300 hp portable diesel engine. The 413 hp portable diesel engine will be permitted under facility ID 0448011903.

3. Facility Emissions and Attainment Status:

   The sum of the facility's total permit allowable emissions is:

   Total Facility Allowable Emissions, tons per year (tpy)

Emissions Unit Description and Facility ID	CO	NO_X	PE	PM_{10}	SO_2	VOC
F001 (roadways and parking) 0448950003			25.2	7.4		
F002 (aggregate storage piles) 0448950003			12.0	5.9		
P901 (crushing, screening, material handling, 438 hp diesel engine) 0448950003	3.04	14.12	4.71	2.32	0.93	1.15
P902 (174 hp diesel engine) 0448960007	1.21	5.61	0.40	0.40	0.37	0.45
P903 (45 hp diesel engine) 0448960008	0.31	1.45	0.10	0.10	0.10	0.12
P904 (85 hp diesel engine) 0448960009	0.59	2.74	0.19	0.19	0.18	0.22
P001 (413 hp diesel engine) 0448011903	12.09	13.31	3.94	*	3.72	4.47
P001 (300 hp diesel engine) 0448011904	8.76	9.67	2.89	*	2.69	3.25
Total facility emissions	26.00	46.90	49.43	16.31	7.99	9.66

*All PE=PM10 for combustion sources per AP-42, Section 3.3, Table 3.3.1, footnote b.

Lucas County is currently undesignated or designated attainment for all pollutants.

4. Source Emissions:

This permit is for the 300 hp 9125Kw) (2.10 mmBTU/hr) portable diesel engine.

	CO (tpy)	NOx (tpy)	PE (tpy)	SO_2 (tpy)	VOC (tpy)
300 hp diesel engine	8.76	9.67	2.89	2.69	3.25

5. Conclusion:

This office recommends issuance of this permit.

6. Please provide additional notes or comments as necessary:

In July, 2010 Crestline Paving & Excavating installed a 413 hp (2.89 mmBTU/hr) portable diesel engine (Caterpillar model 3406B), and a 300 hp (2.10 mmBTU/hr) portable diesel engine (Caterpillar model 3208) to provide power to an existing portable aggregate processing plant located at the 5010 Stickney Avenue, Toledo, Ohio facility. This equipment was installed prior to the issuance of any permits to install (PTI) and permit fees will be doubled. This permit is for the 300 hp (125kW) (2.89 mmBTU/hr) portable diesel engine.

This 1991 Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) emissions unit was manufactured prior to April 1, 2006 and is therefore not subject to the provisions of 40 CFR 60, Subpart IIII – Standards of Performance for Stationary CI ICEs.

As an existing Stationary Reciprocating Internal Combustion Engine (RICE) constructed before June 12, 2006 and located at an area source of HAP, 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary RICEs is applicable to this emissions unit, but has no requirements. It is not subject to Subpart A of this Part and has no initial notification requirement.

The emissions limitation is in accordance with OAC Rule 3745-31-05(E) with only annual reporting requirements for record keeping, requires no startup table for operating hours and does not include a 12-month rolling records requirement, but does include a tpy reporting requirement. This permit has State enforceable emissions limits without any federally enforceable emissions limits.

B.A.T. Determination

The PTIO application indicates that based on S.B. 265, a BAT determination is not necessary for all requested allowable emissions less than 10 tpy. The following discussion addresses the S.B. 265 less than 10 tpy exemption:

The BAT determination for the diesel engine will be determined in accordance with the July 2, 2010 (previously issued on February 19, 2010) interoffice memorandum related to the February 2, 2010 U.S. District Court for the Southern District of Ohio ruling in Sierra Club v. Christopher Korleski, Director of Ohio EPA; a court decision which does not recognize the less than 10 tpy BAT exemption. This memorandum addresses permit processing after the U.S. District Court <10 tpy exemption decision.

Under this memorandum, the November 30, 2001 version of the BAT rule (OAC Rule 3745-31-05) is the current version of the BAT rule (http://www.epa.ohio.gov/dapc/regs/3745_31/3745_31_Historic.aspx). This means the Senate Bill 265 (S.B. 265) exemption cannot be used. The memorandum directs permit writers to develop case-by-case BAT limits following methods used prior to the implementation of S.B. 265. The permit rule citation for less than 10 tpy BAT limits will include both the old rule and the current rule with explanatory language added to the additional terms and conditions.

At full potential to emit, CO, PE, SO_2, and VOC emissions are less than 10 tpy. Because the emissions for CO, PE, SO2, and VOC are less than 10 tpy, the case-by-case BAT exemption will apply. The permit indicates that once the revisions to OAC Rule 3745-31-05(A)(3) have been approved by the U.S. EPA, all emissions limitations for CO, PE, SO2, and VOC set under OAC Rule 3745-31-05(A)(3), operational restrictions, monitoring and recordkeeping, and emission testing terms and conditions, the 10% opacity for a six-minute average, and the sulfur content restriction of 0.5 lb/mmBTU shall be void.

Because the BAT in this permit will be voided by the proposed rule changes, the 10% opacity as a six-minute average will be voided also. Currently, the facility has to comply with both the 10% opacity as a six-minute average and OAC Rule 3745-17-07(A)(1), 20% opacity as a six-minute average. Once the BAT is voided, the facility will only have to comply with OAC Rule 3745-17-07(A)(1).

BAT for small diesel generators was established in PTIs 04-01446 and 04-01450 through 04-01452 as 10% opacity, 0.5 pound of sulfur per mmBTU of actual heat input, and compliance with AP-42 emissions factors for the emissions of CO, NO_X, PE, SO_2, and VOC.

At full PTE, using AP-42 AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 3.3, Table 3.3-1, revised 10/96, the potential emissions for this diesel engine would be:

CO 6.68×10^{-3} lb/hp-hr x 300 hp = 2.00 lbs/hr
NO_X 0.031 lb/hp-hr x 300 hp = 9.30 lbs/hr
PE 2.20×10^{-3} lb/hp-hr x 300 hp = 0.66 lb/hr
SO_2 2.05×10^{-3} lb/hp-hr x 300 hp = 0.615 lb/hr
VOC 2.47×10^{-3} lb/hp-hr x 300 hp = 0.74 lbs/hr

CO 2.00 lbs/hr x 8,760 hrs/yr / 2,000 lbs/ton = 8.76 tpy
NO_X 9.30 lbs/hr x 8,760 hrs/yr / 2,000 lbs/ton = 40.73 tpy
PE 0.66 lb/hr x 8,760 hrs/yr / 2,000 lbs/ton = 2.89 tpy
SO_2 0.615 lb/hr x 8,760 hrs/yr / 2,000 lbs/ton = 2.69 tpy
VOC 0.74 lb/hr x 8,760 hrs/yr / 2,000 lbs/ton = 3.25 tpy

SO_2 emissions limits in AP 42, Fifth edition, of Air Pollution Emission Factors, Chapter 3.3, Table 3.3-1, revised 10/96 are based upon 500 ppm sulfur in diesel fuel.

Under OEPA's Air Toxic's Policy, modeling is required for NO_X and SO_2 if the allowable emissions increase is 25 tons or more, if CO emissions are 100 tpy or more, or if PE emissions increase is 10 tpy or more. For PE the emissions increase will be less than 10 tpy. For CO the emissions increase will be less than 100 tpy. The SO_2 emissions increase will be less than 25 tpy. However, the full potential for NO_X is greater than 25 tpy. In order to avoid modeling, the facility has voluntarily restricted the operating hours to 2080 hours per year. With this reduction in operating hours, the emissions from this engine are reduced to:

NO_X - 9.30 lbs/hr x 2,080 hrs/yr / 2,000 lbs/ton = 9.67 tpy

AP 42, Fifth edition, of Air Pollution Emission Factors, Chapter 3.3, Table 3.3-1, revised 10/96 and will be set as BAT for this permit. With the voluntary reduction in permitted operating hours of this engine to limit annual NO_X emissions, modeling will not be required.

Applicable Rules and Regulations

OAC Rule 3745-31-05(A)(3)	Best Available Technology
OAC Rule 3745-17-07(A)(1)	20% opacity as a 6-minute average, from the stack
OAC Rule 3745-17-11(B)(5)(a)	0.310 lb PE/mmBTU actual heat input
OAC Rule 3745-18-06(B)	Exemption from provisions of OAC rule 3745-18-06(G)
OAC Rule 3745-21-07(B)	Best current technology
OAC Rule 3745-31-05(E)	Volunteered limits to avoid modeling
MACT - 40 CFR Part 63, Subpart ZZZZ	Exempt (1991 Diesel engine)
NSPS - 40 CFR Part 60, Subpart IIII	Exempt (1991 Diesel engine)

Permit Fee

P001 (300hp/2.89 mmBTU/hr)	0-9 mmBTU/hr	$200
Installed prior to PTI issuance	2 x $200 = $400	

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
CO	8.76
NO_X	9.76
PE	2.89
SO_2	2.69
VOC	3.25

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Crestline Paving & Excavating

Facility ID: 0448011904
Permit Number: P0106680
Permit Type: Initial Installation
Issued: 10/7/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Crestline Paving & Excavating

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Authorization

Facility ID: 0448011904
Application Number(s): A0039996
Permit Number: P0106680
Permit Description: 300 HP Diesel Engine
Permit Type: Initial Installation
Permit Fee: $400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/7/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Crestline Paving & Excavating
1913 Nebraska Ave
Toledo, OH 43607

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0106680
Permit Description: 300 HP Diesel Engine

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P001**
Company Equipment ID:	P906
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. P001, 300 HP Portable Generator

Operations, Property and/or Equipment Description:

Portable Generator

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3), as effective 11/30/01	Visible emissions of particulate shall not exceed 10% opacity as a six-minute average. Carbon Monoxide (CO) emissions shall not exceed 2.00 lb/hr. CO emissions shall not exceed 2.08 tons per year (tpy) Nitrogen Oxides (NO_X) emissions shall not exceed 9.30 lb/hr. Particulate Emissions (PE) emissions shall not exceed 0.66 lb/hr. PE shall not exceed 0.69 tpy. Sulfur Dioxide (SO_2) emissions shall not exceed 0.615 lb/hr.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		SO_2 emissions shall not exceed 0.64 tpy. Volatile Organic Compounds (VOC) emissions shall not exceed 0.74 lb/hr. VOC emissions shall not exceed 0.78 tpy. See b)(2)a. through b)(2)c.
b.	OAC Rule 3745-31-05(A)(3), as effective 12/01/06	NO_X emission shall not exceed 0.031 lb/hp-hr See b)(2)d.
c.	OAC Rule 3745-31-05(E)	NOx emissions shall not exceed 9.67 tpy
d.	OAC Rule 3745-17-07(A)(1)	Visible emissions of particulate shall not exceed 20% opacity as a six-minute average.
e.	OAC Rule 3745-17-11(B)(5)(a)	PE shall not exceed 0.310 pound per mmBTU of actual heat input.
f.	OAC Rule 3745-18-06(B)	Exempt, see b)(2)e.
g.	OAC Rule 3745-21-07(B)	See b)(2)f.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC Rule 3745-17-11(B)(5)(a) and OAC Rule 3745-21-07(B).

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC Rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC Rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC Rule 3745-31-05, then these emission limitations/control measures no longer apply.

c. The quality of the oil burned in this emissions unit shall meet a sulfur content not to exceed 0.5 pound per mmBTU of actual heat input.

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC Rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC Rule 3745-31-05(A)(3) do not apply to the CO, PE, SO_2, and VOC emissions from this air contaminant source since the potential to emit for CO, PE, SO_2, and VOC is each less than 10 tons/year.

The emission limitations and control requirements from the amended rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit shall become void after the U.S. EPA approves the rule revision. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)a., b)(2)a., b)(2)c., c)(1), d)(1), d)(2), e)(3), f)(1)a., f)(1)c., and f)(1)h. through f)(1)n.

e. The permittee is exempt from the applicable SO_2 limitations of OAC Rule 3745-18-06(G) by the provisions of OAC Rule 3745-18-06(B).

f. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC Rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC Rule 3745-31-05(A)(3).

On February 18, 2008, OAC Rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC Rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)d.

c) Operational Restrictions

(1) The permittee shall use only distillate fuel oils with a sulfur content no greater than 0.5% by weight for combustion in this emissions unit.

(2) The maximum annual operating time for this emissions unit shall not exceed 2,080 hours per calendar year.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain supplier certification documenting the sulfur content of all fuels received for combustion in this emissions unit.

(2) For each day during which the permittee burns a fuel other than distillate fuel oil with a sulfur content no greater than 0.5% by weight, the permittee shall maintain a record of the type, sulfur content and quantity of fuel burned in this emissions unit.

(3) The permittee shall install and maintain a device (hour meter) capable of tracking the total hours of operation of the engine.

(4) The permittee shall record the cumulative operating hours for each calendar year.

(5) The permittee shall perform weekly 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 an 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 eliminate the visible emissions.

(6) The monitoring and recordkeeping requirements of this section apply only for those calendar quarters during which the emissions unit is located in the State of Ohio.

e) Reporting Requirements

(1) The permittee shall provide in the required annual permit evaluation report:

a. Hours of operation for the calendar year; and

b. Hours of deviation and explanation for deviation, if any.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(5) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for the fuel sulfur content in term numbers d)(1) and d)(2) above:

a. all days during which a fuel other than distillate fuel oil with a sulfur content no greater than 0.5% by weight is used in this emissions unit; and

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

(4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible emissions of particulate shall not exceed 10% opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC Rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

Visible emissions of particulate shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC Rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

CO emissions shall not exceed 2.00 pounds per hour.

Applicable Compliance Method:

This emission limitation is equivalent to emission factors identified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 3.3, Table 3.3-1, revised 10/96 (0.00668 lb/hp-hr) as follows: multiply the emission factor of 0.00668 lb/hp-hr by the maximum horsepower of 300 hp.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

CO emissions shall not exceed 2.08 tons per year.

Applicable Compliance Method:

This limitation was established by multiplying the 2.00 pounds per hour emission rate by a maximum operating hours of 2,080 and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation and the hours of operation restriction (2,080 hours), compliance with the annual emission limitation shall also be demonstrated.

e. Emissions Limitation:

NO_X emissions shall not exceed 9.30 pounds per hour.

Applicable Compliance Method:

This emission limitation is equivalent to emission factors identified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 3.3, Table 3.3-1, revised 10/96 (0.031 lb/hp-hr) as follows: multiply the emission factor of 0.031 lb/hp-hr by the maximum horsepower of 300 hp.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emissions Limitation:

NO_X emissions shall not exceed 9.67 tons per year.

Applicable Compliance Method:

This limitation was established by multiplying the 9.30 pounds per hour emission rate by a maximum operating hours of 2,080 and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation and the

hours of operation restriction (2,080 hours), compliance shall also be shown with the annual emission limitation.

g. Emissions Limitation:

PE shall not exceed 0.310 pound per mmBTU of actual heat input.

Applicable Compliance Method:

Compliance may be demonstrated through the emission factor specified in the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 3.3, Table 3.3-1, revised 10/96 (0.31 lb/mmBTU).

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC Rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used upon approval by the Toledo Division of Environmental Services.

h. Emissions Limitation:

PE shall not exceed 0.66 pound per hour.

Applicable Compliance Method:

This emission limitation is equivalent to emission factors identified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 3.3, Table 3.3-1, revised 10/96 (0.00220 lb/hp-hr) as follows: multiply the emission factor of 0.00220 lb/hp-hr by the maximum horsepower of 300 hp.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC Rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used upon approval by the Toledo Division of Environmental Services.

i. Emissions Limitation:

PE shall not exceed 0.69 ton per year.

Applicable Compliance Method:

Compliance may be demonstrated through calculations performed as follows:

This limitation was established to reflect potential to emit for this emissions unit. Multiply the 0.66 pound per hour emission rate by 2080 hours per year and divide by 2000 pounds per ton.

j. Emission Limitation:

SO_2 emissions shall not exceed 0.5 pound per mmBTU of actual heat input.

Applicable Compliance Method:

Compliance may be demonstrated through the emission factor in AP-42, Chapter 3.3, Table 3.3-1, revised 10/96 (0.29 lb/mmBTU).

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC Rule 3745-18-04(E) and (F). Alternative U.S. EPA approved test methods may be used upon approval by the Toledo Division of Environmental Services.

k. Emission Limitation:

SO_2 emissions shall not exceed 0.615 pound per hour.

Applicable Compliance Method:

This emission limitation is equivalent to emission factors identified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 3.3, Table 3.3-1, revised 10/96 (0.00205 lb/hp-hr) as follows: multiply the emission factor of 0.00205 lb/hp-hr by the maximum horsepower of 300 hp.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC Rule 3745-18-04(E) and (F). Alternative U.S. EPA approved test methods may be used upon approval by the Toledo Division of Environmental Services.

l. Emission Limitation:

The emissions of SO_2 shall not exceed 0.64 tons per year.

Applicable Compliance Method:

Compliance may be demonstrated through calculations performed as follows:

This limitation was established to reflect potential to emit for this emissions unit. Multiply the 0.615 pound per hour emission rate by 2080 hours per year and divide by 2000 pounds per ton.

m. Emission Limitation:

VOC emissions shall not exceed 0.74 pounds per hour.

Applicable Compliance Method:

This emission limitation is equivalent to emission factors identified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 3.3, Table 3.3-1, revised 10/96 (0.00251 lb/hp-hr) as follows: multiply the emission factor of 0.00251 lb/hp-hr by the maximum horsepower of 300 hp.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC Rule 3745-21-10. Alternative U.S. EPA approved test methods may be used upon approval by the Toledo Division of Environmental Services.

n. Emission Limitation:

VOC emissions shall not exceed 0.78 tons per year.

Applicable Compliance Method:

Compliance may be demonstrated through calculations performed as follows:

This limitation was established to reflect potential to emit for this emissions unit. Multiply the 0.74 pounds per hour emission rate by 2080 hours per year and divide by 2000 pounds per ton.

o. Emission Limitation:

NO_X emissions shall not exceed 0.031 lb/hp-hr.

This emission limitation is equivalent to emission factors identified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 3.3, Table 3.3-1, revised 10/96.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used upon approval by the Toledo Division of Environmental Services.

g) Miscellaneous Requirements

Notice to Relocate a Portable or Mobile Source.

(1) At the discretion and following the approval of the Director (the Toledo Division of Environmental Services), the permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate notification and exemption requirements have been met. Pursuant to the permanent exemption for portable sources in OAC Rule 3745-31-03(A)(1), the Director may issue a “Notice of Site Approval” for any pre-disclosed location if the portable source meets the requirements of OAC Rule 3745-31-05(H), as follows:

a. the portable source is operating pursuant to a currently effective permit-to-install (PTI), permit-to-install and operate (PTIO), or has been approved for registration status and continues to comply with the requirements of the permit and any applicable state and/or federal rules;

b. the portable source has been issued a PTIO or PTI and the permittee continues to comply with the requirements of the permit, including any applicable best available technology (BAT) determination;

c. the portable source owner has identified and submitted the proposed site to the Ohio EPA;

d. the permitting District Office/local air agency and the District Office/local air agency having jurisdiction over the new site (if different) have determined that the portable source will have an acceptable environmental impact at the proposed site;

e. a public notice, meeting the requirements OAC Rule 3745-47, is published in the county where the proposed site is located;

f. the owner of the proposed site (if not the permittee) has provided the portable source owner with approval, or an equivalent declaration, that it is acceptable to move the portable source to the proposed site; and

g. the permittee has provided the Ohio EPA with a minimum of a 15-day written notice of the relocation.

The portable source can be relocated upon receipt of the Director's "Notice of Site Approval" for the site. Any site approval issued by the Ohio EPA, pursuant to OAC Rule 3745-31-05(H) is subject to expiration and renewal. Pursuant to OAC Rule 3745-31-07(C)(3), any site approval for a portable source shall be issued for a period of time determined to be appropriate by the Director and the renewal will be reevaluated and subject to the same requirements above.

(2) If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC Rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC Rule 3745-77-01, must also meet all applicable requirements under the Title V program contained in OAC Rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. 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.