



**Environmental  
Protection Agency**

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

10/27/2010

Mr. Gary Platek  
Turf Care Supply Corp. - Martins Ferry Plant  
50 PEARL RD, STE 200  
BRUNSWICK, OH 44212

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0607090125  
Permit Number: P0107032  
Permit Type: Initial Installation  
County: Belmont

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)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Kevin Boyce," 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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-SEDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Turf Care Supply Corp. - Martins Ferry Plant**

Facility ID: 0607090125  
Permit Number: P0107032  
Permit Type: Initial Installation  
Issued: 10/27/2010  
Effective: 10/27/2010  
Expiration: 10/27/2020





Division of Air Pollution Control
Permit-to-Install and Operate
for
Turf Care Supply Corp. - Martins Ferry Plant

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
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? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 5
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator?..... 6
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 6
15. What happens if a portion of this permit is determined to be invalid? ..... 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions ..... 10
1. F001, Plant roadways and parking areas ..... 11
2. F009, Sulfur Coated Urea Plant - conditioning process and screeners..... 16
3. P902, Sulfur Coated Urea Plant – pre-screening process equipment..... 19



## Authorization

Facility ID: 0607090125

Application Number(s): A0039429

Permit Number: P0107032

Permit Description: Chapter 31 modifications of previously unpermitted EUs to address increases in throughput of equipment used to manufacture sulfur coated urea (SCU) and blend fertilizers; Chapter 31 modifications to previously permitted EUs are covered in Permit No. P0106593

Permit Type: Initial Installation

Permit Fee: \$4,400.00

Issue Date: 10/27/2010

Effective Date: 10/27/2010

Expiration Date: 10/27/2020

Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Turf Care Supply Corp. - Martins Ferry Plant  
100 Picoma Rd.  
Martins Ferry, OH 43935

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:

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

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: P0107032  
Permit Description: Chapter 31 modifications of previously unpermitted EUs to address increases in throughput of equipment used to manufacture sulfur coated urea (SCU) and blend fertilizers; Chapter 31 modifications to previously permitted EUs are covered in Permit No. P0106593

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

- Emissions Unit ID: F001**  
Company Equipment ID: Plant Roadways and Parking Areas  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: F009**  
Company Equipment ID: F009  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P902**  
Company Equipment ID: Pre-Screening Process Equipment  
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 Ohio EPA DAPC, Southeast District Office 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<sup>1</sup> 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.

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

---

<sup>1</sup> 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).

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. F001, Plant roadways and parking areas

Operations, Property and/or Equipment Description:

Paved and unpaved roadways and parking areas; Chapter 31 modification to increase annual vehicle miles traveled and incorporate updated emissions factors; maximum of 5,610 annual vehicle miles traveled (paved roadways and parking areas) and a maximum of 65,105 annual vehicle miles traveled (unpaved roadways and parking areas)

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)	<p>Fugitive particulate emissions (PE) shall not exceed 11.16 tons per year.</p> <p>Visible PE from unpaved roadways and parking areas shall not exceed three minutes during any sixty-minute observation period.</p> <p>Visible PE from paved roadways and parking areas shall not exceed one minute during any sixty-minute observation period.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a.-f. below.
b.	OAC rule 3745-17-07(B)(5)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-18(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the paved roadways and parking areas using vacuum sweeping at sufficient treatment frequencies to ensure compliance. The permittee shall treat the unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved and unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- c. Any unpaved roadway or parking area, which during the term of this permit is paved shall be subject to the visible emission limitation of one minute during any 60-minute period. Any unpaved roadway or parking area, which during the term of this permit takes the characteristics of a paved surface due to the application of certain types of dust suppressants, shall remain subject to the visible emission limitation for unpaved roadways and parking areas.
- d. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.



f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

Table with 2 columns: Roadway/Parking Area Segment and Minimum inspection frequency. Rows include Unpaved roadways (Segments A-C) and Paved roadways (Segments D-E).

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended.

(3) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
c. the dates the control measures were implemented; and
d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

(4) The information required in d)(3)d. shall be kept separately for (i) the unpaved roadways and parking areas and (ii) the paved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) 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.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of this permit shall be determined in accordance with the following methods:

- a. Emissions Limitation:  
Fugitive PE shall not exceed 11.16 tons per year.

Applicable Compliance Method:

Compliance with annual emissions limitations shall be determined based on the emission factor calculations for paved and unpaved roadways and parking areas in AP-42 section 13.2.1 (paved), and 13.2.2 (unpaved), (11/06). Initial compliance has been determined utilizing inputs provided by the permittee in their application as follows:

Unpaved sections:

$$EF = ((k \times (s/12)^a \times (W/3)^b))((365-p)/365)$$

Where:

EF = size-specific emission factor (lb/VMT)

k (lb/VMT) = 4.9

a = 0.7

b = 0.45

s = % surface material silt content = 10

W = mean vehicle weight (tons) = 23.46

p = number of rain days per year >0.01 in. = 145

Therefore, EF = 6.56 lb/VMT

Maximum travel = 65,105 VMT/year

$$(65,105 \text{ VMT/year})(6.56 \text{ lb/VMT})(1 \text{ ton}/2,000 \text{ lbs}) = 213.5 \text{ TPY uncontrolled PE}$$

Assume 95% control efficiency for roadway watering (engineering estimate of permittee)

$$(213.5)(1-0.95) = 10.67 \text{ TPY controlled PE}$$

Paved sections:

$$EF = ((k*(sL/2)^{0.65} \times (W/3)^{1.5}) - C) \times (1 - P/(4 \times 365))$$

Where:

EF = particulate emission factor (lb/VMT)

k = particle size multiplier (lb/VMT) = 0.082

sL = road surface silt loading (g/m<sup>2</sup>) = 8.2

W = mean vehicle weight (tons) = 21.42

C = emission factor for exhaust, brake wear, and tire wear (lb/VMT) = 0.00047

P = number of rain days per year >0.01 in. = 145

Therefore, EF = 3.52 lb/VMT

Maximum travel = 5,610 VMT/year

$$(5,610 \text{ VMT/year})(3.52 \text{ lb/VMT})(1 \text{ ton}/2,000 \text{ lbs}) = 9.89 \text{ TPY uncontrolled PE}$$

Assume 95% control efficiency for roadway watering (engineering estimate of permittee)

$$(9.89 \text{ TPY})(1 - 0.95) = 0.49 \text{ TPY controlled PE}$$

$$\text{Total fugitive PE} = 10.67 \text{ TPY} + 0.49 \text{ TPY} = 11.17 \text{ tons per year}$$

b. Emissions Limitations:

Visible PE from unpaved roadways and parking areas shall not exceed three minutes during any sixty-minute observation period.

Visible PE from paved roadways and parking areas shall not exceed one minute during any sixty-minute observation period.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

(1) None.



2. F009, Sulfur Coated Urea Plant - conditioning process and screeners

Operations, Property and/or Equipment Description:

17 tons per hour enclosed conditioning and screening equipment including one conditioner drum, one screener, one finished product elevator, one truck hopper and three conveyors; Chapter 31 modification to increase maximum annual throughput to 148,920 tons per year

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)	Fugitive particulate emissions (PE) shall not exceed 0.96 ton per year.  No visible PE of fugitive dust from the egress points of the enclosure for this emissions unit.  Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.  See b)(2)a.-d. below.
b.	OAC rule 3745-17-07(B)	The emissions limitation specified by this rule is less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-08(B)	The emissions limitation specified by this rule is less stringent than the emissions



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitations established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

- Conditioner drum
- Screeener
- Finished product elevator
- Truck hopper
- Conveyors (3)

- b. The permittee shall employ best available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee will maintain the partial enclosure of the above-mentioned material handling operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the daily VE check conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure(s) is unnecessary.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in a monitoring and recordkeeping log. If visible emissions are observed, the permittee shall also note the following in the monitoring and recordkeeping log:
  - a. the color of the emissions;



- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) 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.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b(1) of this permit shall be determined in accordance with the following method(s):

- a. Emissions Limitation:  
Fugitive PE shall not exceed 0.96 ton per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the following one-time calculation based on the emission factors in AP-42 Section 11.19.2 (8/04), 70% control efficiency (CE) for the partial enclosure from RACM Table 2.1.3-3 and a maximum annual throughput of 148,920 tons per year:

$$\begin{aligned}
 PE &= [(\# \text{ of transfer points})(\text{maximum annual throughput})(\text{transfer points EF}) + \\
 &\quad (\# \text{ of screeners})(\text{maximum annual throughput})(\text{scrubber EF})(70\% \\
 &\quad \text{CE})]/2,000 \text{ lbs/ton} \\
 &= [(6)(148,920 \text{ tons per year})(0.003)(1-0.70) + (1)(148,920 \text{ tons per} \\
 &\quad \text{year})(0.025)(1-0.70)]/2,000 \text{ lbs/ton} \\
 &= 0.96 \text{ tons per year}
 \end{aligned}$$

- b. Emissions Limitation:  
No visible PE of fugitive dust from the egress points of the enclosure for this emissions unit.

Applicable Compliance Method:

If required, visible emissions of fugitive dust shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

- (1) None.



3. P902, Sulfur Coated Urea Plant – pre-screening process equipment

Operations, Property and/or Equipment Description:

17 ton per hour enclosed urea pre-screening equipment including one surge bin, one feed auger, one pre-screener feed elevator, one pre-screener, and one pre-screener discharge elevator controlled with a baghouse; Chapter 31 modification to increase maximum annual throughput to 148,920 tons per year

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)	<p>Particulate emissions (PE) from the baghouse stack shall not exceed 0.007 pound per hour and 0.03 ton per year.</p> <p>Fugitive PE shall not exceed 0.10 ton per year.</p> <p>No visible PE from the baghouse stack and no visible emissions of fugitive dust.</p> <p>Best available control measures that are sufficient to eliminate visible emissions of fugitive dust.</p> <p>See b)(2)a.-e. below.</p>
b.	OAC rule 3745-17-07(A) OAC rule 3745-17-07(B)	The emissions limitations specified by these rules are less stringent than the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-08(B) OAC rule 3745-17-11(B)	emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.
- b. The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:  
  
  - Pre-screener surge bin/raw material conditioner
  - Feed auger
  - Pre-screener feed elevator
  - Pre-screener
  - Pre-screener discharge elevator
- c. The permittee shall employ best available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee will maintain the partial enclosure of the above-mentioned material handling operations, and will ensure that the baghouse captures 90% of the emissions from the sulfur coating drum. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the daily VE check conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure(s) is unnecessary.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving



this emissions unit. The presence or absence of any visible emissions shall be noted in a monitoring and recordkeeping log. If visible emissions are observed, the permittee shall also note the following in the monitoring and recordkeeping log:

- a. the color of the emissions;
b. the total duration of any visible emissions incident; and
c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
(2) 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.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of this permit shall be determined in accordance with the following method(s):
a. Emissions Limitations:
PE from the baghouse stack shall not exceed 0.007 pound per hour and 0.03 ton per year.
Fugitive PE shall not exceed 0.10 ton per year.

Applicable Compliance Method:

Compliance with the emissions limitations shall be demonstrated by the following one-time calculations based on the emission factors in AP-42 Section 11.19.2 (8/04), a baghouse with 90% capture efficiency and 99% control efficiency, 70% control efficiency for the building enclosure from RACM Table 2.1.3-3, a maximum hourly throughput of 17 tons, and a maximum annual throughput of 148,920 tons:

PE (lb/hr stack)= [(# of transfer points)(maximum hourly throughput)(transfer points EF) + (# of screeners)(maximum hourly throughput)(screener EF)]
= [(6)(17 tons per hour)(0.003 lb/ton) + (1)(17 tons per hour)(0.025 lb/ton)]
= 0.73 lb/hr uncontrolled PE x 0.90 x (1-0.99)
= 0.007 lb/hr

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60



"Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

$$\begin{aligned}
\text{PE (ton/yr stack)} &= [(\# \text{ of transfer points})(\text{maximum annual throughput})(\text{transfer points EF}) + (\# \text{ of screeners})(\text{maximum annual throughput})(\text{scrubber EF})]/2,000 \text{ lbs/ton} \\
&= [(6)(148,920 \text{ tons per year})(0.003 \text{ lb/ton}) + (1)(148,92 \text{ tons per year})(0.025 \text{ lb/ton})]/2,000 \text{ lbs/ton} \\
&= 3.20 \text{ tons per year uncontrolled PE} \times 0.90 \times (1-0.99) \\
&= 0.03 \text{ ton per year}
\end{aligned}$$

$$\begin{aligned}
\text{PE (fugitive)} &= (3.20 \text{ tons per year})(1-0.90)(1-0.70) \\
&= 0.10 \text{ ton per year}
\end{aligned}$$

- b. Emissions Limitations:  
No visible PE from the baghouse stack and no visible emissions of fugitive dust.

Applicable Compliance Method:  
If required, visible particulate emissions shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

- (1) None.