State of Ohio Environmental Protection Agency

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

Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
COLUMBIANA COUNTY
Application No: 02-18847
Fac ID: 0215020287

DATE: 11/3/2005

D.W. Dickey and Sons, Inc.
Paul Boyd
1080 Elmwood Street
East Liverpool, OH 43920

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NEDO** **Eastgate Development & Transportation Study** **WV** **PA**

COLUMBIANA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-18847** FOR AN AIR CONTAMINANT SOURCE FOR
D.W. Dickey and Sons, Inc.

On 11/3/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **D.W. Dickey and Sons, Inc.**, located at **1080 Elmwood Street, East Liverpool**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-18847:

Changes per appeal on material handling.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]

DRAFT MODIFICATION OF PERMIT TO INSTALL 02-18847

Application Number:	02-18847
Facility ID:	0215020287
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	D.W. Dickey and Sons, Inc.
Person to Contact:	Paul Boyd
Address:	1080 Elmwood Street East Liverpool, OH 43920

Location of proposed air contaminant source(s) [emissions unit(s)]:
1080 Elmwood Street
East Liverpool, **Ohio**

Description of proposed emissions unit(s):
Changes per appeal on material handling.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
Fugitive PM	17.9
PM	1.4

Emissions Unit ID: **F001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F001 - Plant Roadways and parking areas	OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions shall not exceed 1.0 ton per year. There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed three minutes during any sixty-minute observation period. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08. See Section A.2.b through A.2.d.
	OAC rule 3745-17-07(B)(5)	The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08	Reasonably available control measures shall be used that are sufficient to minimize or eliminate visible emissions of fugitive dust.

2. Additional Terms and Conditions

2.a The unpaved roadways that are covered by this permit and are subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

i. Truck routes = 0.3 miles of unpaved road, covering 90,000 square feet

ii. Loader routes = 0.1 miles of unpaved road, covering 40,000 square feet

2.b The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee has committed to the following control measures:

i. The unpaved roadways shall be oiled twice per year.

ii. The vehicle speed for the trucks and loaders shall not exceed 5 miles per hour.

2.c Nothing in this paragraph shall prohibit the permittee from employing other reasonably available control measures to ensure compliance. Other control measures include but are not limited to the following:

i. The periodic application of asphalt, water or other suitable dust suppression chemicals on dirt or gravel roads and parking lots, and other surfaces which can cause emissions of fugitive dust.

ii. The covering, at all times, of open bodied vehicles when transporting materials likely to become airborne.

iii. The paving of roadways and the maintaining of roadways in a clean condition.

2.d 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.

B. Operational Restrictions

When waste oil is used for controlling fugitive dust from the unpaved road segments and parking areas, the following restrictions shall be followed:

1. The permittee shall certify or possess certification that all waste oil used to control fugitive dust meets the PCB limitations set forth in 40 CFR 761, and that there are no listed hazardous wastes or characteristic hazardous wastes as set forth in 40 CFR 261.

2. Waste oil shall be applied in such a manner as to prevent pollution of waters of the State as required by the Ohio Revised Code, section 6111.

3. Waste oil shall be applied only to unpaved road and parking area surfaces, and only between sunrise and sundown (daylight hours).

4. Waste oil shall not be applied to a water-saturated surface nor to surfaces on days of predicted rainfall events.

5. Waste oil shall not be applied at an application rate that allows pooling of liquid.

6. Waste oil shall not be applied to the same surface more frequently than twice per week.

7. The application of waste oil shall not cause runoff from the application surface.

8. Waste oil shall not be applied to vegetation near or adjacent to surfaces being treated.

9. Waste oil shall not be applied within 12 feet of structures crossing bodies of water or drainage ditches.

10. The discharge of waste oil must stop when the applicator vehicle stops.

11. The applicator vehicle must be moving at least 5 miles per hour at all times while the waste oil is being applied.

12. The applicator vehicle discharge valve shall be locked closed between the waste oil collection point and the specific surfaces which have been approved for waste oil application.

13. Any valves that provide for tank draining other than through the spreader bar must be locked closed during waste oil application and transport.

14. The angle of discharge from the applicator vehicle spreader bar shall be greater than 60 degrees from the perpendicular to the unpaved surface.

C. Monitoring and/or Record keeping Requirements

1. Records shall be kept of the dates of individual waste oil applications and the quantity of all oil applied, and the oil's certificate of compliance with 40 CFR 761, and 40 CFR 261. The certificate of compliance should include, but not be limited to, the name of the oil supplier and an analysis of the oil. The analysis shall include a standard PCB test (gas chromatography using electron capture detector, a column packing of OV-1 or OV-17 and a florisil clean-up) and representative sampling methods, EP toxicity test procedures, and chemical analysis test methods as specified in 40 CFR 261, App. I, II and III.

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

3. The permittee may, upon receipt of written approval from Ohio EPA's Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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

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

b. The date of each inspection where it was determined by the permittee that it was

necessary to implement the control measures.

c. The dates the control measures were implemented.

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.

The information required in Section C.4.d shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

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

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

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

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

E. Testing Requirements

1. Emission Limitation:
Fugitive particulate emissions shall not exceed 1.0 ton per year.

Applicable Compliance Method:
Compliance with the annual fugitive particulate emission limitation shall be determined by the following equation:

$$E = EF \times VMT \times \text{ton}/2{,}000 \text{ lbs}$$

where;

E = Emissions of fugitive particulates, in ton per year

EF = Emission factor, in lb PM/Vehicle Miles Traveled, taken from AP-42, Chapter 13.2.2 (Unpaved roads), 10/01. EF = k x (s/12)a x (W/3)b, where k= 4.0, a = 0.7, and b = 0.45 for PM emissions. PTI application reports "s" = 4.5%, representing the surface material silt content (%) and "W" = 40 tons, representing mean vehicle weight. EF is calculated to be 0.33 lb PM/VMT.

VMT = Vehicle Miles Traveled, in miles per year.

2. Emission Limitation:
Fugitive dust emissions limit of no visible emissions, except for a period of time not to exceed three minutes during any sixty-minute observation period.

Applicable Compliance Method:
Compliance with the visible emission limitation for the unpaved roadways and parking areas shall be determined in accordance with test method 22 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
F002 - MODIFIED Raw material storage piles, truck unloading to piles, and truck unloading from piles contained in a building.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-08
	OAC rule 3745-17-07(B)(1)	
	OAC rule 3745-17-07(B)(6)	

Applicable Emissions Limitations/Control Measures	
Fugitive particulate emissions shall not exceed 15.0 tons per year.	Reasonably available control measures shall be used that are sufficient to minimize or eliminate visible emissions of fugitive dust.
There shall be no visible particulate emissions from any storage pile for a period of time not to exceed three minutes during any sixty-minute observation period.	
Visible particulate emissions from the truck unloading and truck loading operations shall not exceed 20% opacity as a three-minute average.	
The requirements specified by this rule also include compliance with the requirements of OAC rule 3745-17-08. See Section A.2.a.	
The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(A)(3).	
The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

2.a The permittee shall employ reasonably available control measures for the above-identified material handling operations and storage for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, to the extent feasible, the permittee has committed to contain the material handling operations and storage piles within a building enclosure to ensure compliance with the emission limitations. If material loading or unloading needs to occur outside of the building, the permittee shall minimize drop height as a reasonably available control measure.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. Another control measure may be the covering, at all times, of open bodied vehicles when transporting materials likely to become airborne.

2.b For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is (are) unnecessary.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily inspections of the material handling and storage operations to ensure that to the extent feasible all operations are performed within the building enclosure. If during the daily inspection, loading or unloading is occurring outside of the building, the permittee shall record the type of vehicle being loaded or unloaded and the reason it was not feasible to conduct such activity within the building.

2. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

Material handling operation(s)	Minimum inspection frequency
Load in/load out of outdoor storage piles	daily

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

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

a. The date and reason any required inspection was not performed;

b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);

c. The dates the control measure(s) was (were) implemented; and

d. On a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 4.d shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee may, upon receipt of written approval from Ohio EPA's Northeast District Office, modify the above-mentioned inspection frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

6. The permittee shall maintain the following annual record:

a. Amount of material loaded to the storage piles, in tons per calendar year.

b. Amount of material unloaded from the storage piles, in tons per calendar year.

c. Average or typical moisture content of the material stored in piles during each

calendar year.

d. Average or typical wind speed within the building during each calendar year.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify each day when a required inspection of the material handling and storage, as mentioned in Section C above, was not performed. This report shall be submitted to the Ohio EPA Northeast District Office.

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

E. Testing Requirements

1. Emission Limitation:
Fugitive particulate emissions shall not exceed 15.0 tons per year.

Applicable Compliance Method:
Compliance with the annual fugitive particulate emission limitation shall be determined by the following equation:

$$E = E_{\text{truck unloading}} + E_{\text{storage piles}} + E_{\text{truck loading}}$$

where;

E = Total emissions in tons per year of fugitive particulate emissions from this emissions unit.

$E_{\text{truck unloading}}$ = Emissions, in tons per year, of fugitive particulate emissions from the truck unloading of materials to the storage piles. This emission rate shall be calculated using the following equation:

$E_{\text{truck unloading}}$ = Annual through-put (tons/yr) x 0.2 lb PM/ton ton/2,000 lbs x (1 - 0.35)

The annual through-put is the amount of material unloaded to the storage

piles, as recorded in Section C. 6 of this permit.

0.2 lb PM/ton is an emission factor found in Ohio RACM, Table 2.12-1.

The reported control efficiency of the building enclosure is 35%.

$E_{storage\ piles}$ = Emissions, in tons per year, of fugitive particulate emissions from the storage piles. This emission rate shall be calculated using the following equation:

$E_{storage\ piles}$ = Annual through-put of material (tons/yr) x EF (lb PM/ton) x ton/2,000 lbs x (1 - 0.35)

The annual through-put is the amount of material unloaded or loaded.

EF = Emission factor, as calculated by $(k)(00.32)(U/5)^{1.3}$ / $(M/2)^{1.4}$, where k = 0.74 for aerodynamic particle size less than 30 um, U = wind speed in miles per hour, and M = moisture content of material, in percentage. This equation is from AP-42, 13.2.4.

The reported control efficiency of the building enclosure is 35%.

$E_{truck\ loading}$ = Emissions, in tons per year, of fugitive particulate emissions from the truck loading of materials from the storage piles. This emission rate shall be calculated using the following equation:

$E_{truck\ loading}$ = Annual through-put (tons/yr) x 0.2 lb PM/ton ton/2,000 lbs x (1 - 0.35)

The annual through-put is the amount of material loaded from the storage piles, as recorded in Section C. 6 of this permit.

0.2 lb PM/ton is an emission factor found in Ohio RACM, Table 2.12-1.

The reported control efficiency of the building enclosure is 35%.

2. Emission Limitation:
There shall be no visible particulate emissions from any storage pile for a period of time not to exceed three minutes during any sixty-minute observation period.

Applicable Compliance Method:
Compliance with the visible emission limitation for the storage piles shall be determined in accordance with test method 22 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

3. Emission Limitation:
Visible particulate emissions from the truck unloading and truck loading operations shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:
Compliance with the visible emission limitation for the truck unloading and loading operations shall be determined in accordance with test method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
F003 - Material loading from the elevator to bagging and bulk loading	OAC rule 3745-31-05(A)(3)

	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-07(B)(1)	Fugitive particulate emissions shall not exceed 1.9 tons per year.
OAC rule 3745-17-08(B)	Visible particulate emissions from the material loading from the elevator to bagging and bulk loading operations shall not exceed 20% opacity as a three-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08. See Section A.2.a. The requirement specified by this rule is equivalent to the requirement established pursuant to OAC rule 3745-31-05(A)(3). Reasonably available control measures shall be used that are sufficient to minimize or eliminate visible emissions of fugitive dust.

2. Additional Terms and Conditions

2.a The permittee shall employ reasonably 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 permittee's permit application, the permittee has committed to contain the material handling operations within a building enclosure for the bagging operations and to provide an enclosure telescoping chute for the bulk loading

operations to ensure compliance with the emission limitations.

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

B. Operational Restrictions

1. The permittee shall conduct all material bagging within the enclosed building. The permittee shall also conduct all material bulk loading using an enclosed telescoping chute.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall perform daily inspections of the material bagging to ensure that all operations are performed within the building enclosure. The permittee shall also perform daily inspections of the bulk loading operations to ensure that all operations are performed using an enclosed telescoping chute.

2. The permittee may, upon receipt of written approval from Ohio EPA's Northeast District Office, modify the above-mentioned inspection frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

3. The permittee shall maintain records of the dates and reasons when a daily inspection was not performed.

4. The permittee shall maintain the following annual record:

a. Amount of material bagged, in tons per calendar year.

b. Amount of material sold in bulk, in tons per calendar year.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify each day when the required inspection of the material bagging and bulk loading, as mentioned in Section C.1 above, was not performed. This report shall be submitted to the Ohio EPA, Northeast District Office.

2. The deviation reports shall be submitted in accordance with the reporting requirements

of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Emission Limitation:
Fugitive particulate emissions shall not exceed 1.9 tons/year.

Applicable Compliance Method:
Compliance with the annual fugitive particulate emission limitation shall be determined by the following equation:

$$E = E_{bagging} + E_{bulk\ loading}$$

where;

E = Total emissions in tons per year of fugitive particulate emissions from this emissions unit.

$E_{bagging}$ = Emissions, in tons per year, of fugitive particulate emissions from the bagging operations. This emission rate shall be calculated using the following equation:

$$E_{bagging} = A \times 0.2 \text{ lb PM/ton} \times \text{ton}/2{,}000 \times (1 - 0.70)$$

A = The amount of material bagged per year, as recorded in C.4.a.

0.2 lb PM/ton is an emission factor found in Ohio RACM, Table 2.12-1.

The reported control efficiency of the building containing the bagging operation is 70%.

$E_{bulk\ loading}$ = Emissions, in tons per year, of fugitive particulate emissions from the bulk loading operations. This emission rate shall be calculated using the following equation:

$$E_{bulk\ loading} = A \times 0.2 \text{ lb PM/ton} \times \text{ton}/2{,}000 \times (1 - 0.75)$$

A = The amount of material bulk loaded per year, as recorded in C.4.b.

0.2 lb PM/ton is an emission factor found in Ohio RACM, Table 2.12-1.

The reported control efficiency of the enclosed telescoping chute for the bulk loading operation is 75%.

2. Emission Limitation:
Visible particulate emissions from the bagging and bulk loading operations shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:
Compliance with the visible emission limitation for the bagging and bulk loading operations shall be determined in accordance with test method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
P001 - Material unloading from yard trucks to elevator, equipped with a baghouse.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-08
		OAC rule 3745-17-11(A)(2)
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-07(B)(1)	

Applicable Emissions Limitations/Control Measures	
Particulate emissions shall not exceed 0.64 lb/hour and 0.7 tons/year.	
Visible particulate emissions from the stack serving this emissions unit shall not exceed 5% opacity, as a 6-minute average.	
Visible fugitive particulate emissions from the material unloading from yard trucks to the elevator shall not exceed 20% opacity as a three-minute average.	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08. See Section A.2.a.	
The requirement specified by this rule is less stringent than the requirement established pursuant to OAC rule 3745-31-05(A)(3).	
The requirement specified by this rule is equivalent to the requirement established pursuant to OAC rule 3745-31-05(A)(3)	
Reasonably available control measures shall be used that are sufficient to minimize or eliminate visible emissions of fugitive dust.	
	The requirement specified by this rule is less stringent that the requirement established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall employ reasonably available control measures for the operation of material unloading from yard trucks to the elevator for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to provide a fabric filter/baghouse to capture and control particulate emissions from the operation of material unloading from yard trucks to the elevator. The fabric filter/baghouse is to have an overall control efficiency of at least 90%. The fabric filter/baghouse shall also achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are to be no visible particulate emissions from the exhaust stack, whichever is less stringent.

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

B. Operational Restrictions

1. The fabric filter/baghouse shall be in operation at all times when material is unloaded to the elevator.

2. The pressure drop across the baghouse shall be maintained within the range of 1 to 10 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. The permittee shall perform daily checks, when the emission unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. The color of the emissions;

b. Whether the emissions are representative of normal operations;

c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. The total duration of any visible emission incident; and

e. Any corrective actions taken to eliminate the visible emissions.

3. The permittee shall collect and record the following information for each day:

a. The amount of material unloaded to the elevator, in tons per day.

b. The number of hours of operation, in hours per day.

c. The rate of material unloading, in tons per hour, calculated by dividing the number of tons unloaded per day (C.3.a) by the number of operating hours per day (C.3.b).

4. The permittee shall collect and record the amount of material unloaded to the elevator, in tons per year, for each calendar year.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit a deviation (excursion) report that identifies all periods of time when the fabric filter was not in operation when materials were unloaded to the elevator. The deviation report shall also identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

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

E. Testing Requirements

1. Emission Limitation:
Particulate emissions shall not exceed 0.64 lb/hour

Applicable Compliance Method:
Compliance with the hourly particulate emission limitation shall be determined by the following equation:

$$E = A \times EF \times (1 - CE)$$

where;

E = Emissions rate, in lb/hr

A = Hourly material unloading rate, in tons per hour, as recorded in Section C.2.c

EF = Ohio RACM Table 2.12-1 provides an emission factor of 0.2 lb PM/ton for loading operations.

CE = Control efficiency of fabric filter/baghouse

If required by the Ohio EPA, compliance with the allowable particulate emission limit shall also be determined in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

2. Emission Limitation:
Particulate emissions shall not exceed 0.7 ton/yr

Applicable Compliance Method:
Compliance with the annual particulate emission limitation shall be determined by the following equation:

$$E = A \times EF \times \text{ton}/2{,}000 \text{ lbs} \times (1 - CE)$$

where;

E = Emissions rate, in lb/hr

A = Hourly material unloading rate, in tons per hour, as recorded in Section C.2.c

EF = Ohio RACM Table 2.12-1 provides an emission factor of 0.2 lb PM/ton for loading operations.

CE = Control efficiency of fabric filter/baghouse

3. Emission Limitation:
Visible particulate emissions from the stack serving this emissions unit shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be determined in accordance with test method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996.

4. Emission Limitation:
Visible fugitive particulate emissions from the material unloading from yard trucks to the elevator shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:
Compliance with the visible fugitive emission limitation for the operation of material unloading to the elevator shall be determined in accordance with test method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
P002 - Material handling from elevator to enclosed belt conveyor, silos, enclosed screw conveyor/mixer, and elevator, equipped with a particulate control device.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(A)(2)
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-07(B)(1)	
	OAC rule 3745-17-08	

Applicable Emissions Limitations/Control Measures	
Particulate emissions shall not exceed 0.64 lb/hour and 0.7 tons/year.	
Visible particulate emissions from the stack serving this emissions unit shall not exceed 5% opacity, as a 6-minute average.	
Visible fugitive particulate emissions from the material handling operations of this emissions unit shall not exceed 20% opacity as a three-minute average.	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08. See Section A.2.a.	
The requirement specified by this rule is less stringent that the requirement established pursuant to OAC rule 3745-31-05(A)(3)	
The requirement specified by this rule is equivalent to the requirement established pursuant to OAC rule 3745-31-05(A)(3)	
Reasonably available control measures shall be used that are sufficient to minimize or eliminate visible emissions of fugitive dust.	
	The requirement specified by this rule is less stringent that the requirement established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall employ reasonably available control measures for the operation of material handling from the elevator to an enclosed belt conveyor, silos, enclosed screw conveyor/mixer, and elevator for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to provide a fabric filter/baghouse or displacement filter to capture and control particulate emissions from this emissions unit. This control device is to have an overall control efficiency of at least 90%. This control device shall also achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are to be no visible particulate emissions from the exhaust stack, whichever is less stringent.

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

B. Operational Restrictions

1. The particulate control device shall be in operation at all times when material is handled from the elevator, to the enclosed belt conveyor, to the silos, to the enclosed screw conveyor/mixer and to the elevator.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day:

a. The amount of material handled from the elevator, to the enclosed belt conveyor, to the silos, to the enclosed screw conveyor/mixer and to the elevator, in tons per day.

b. The number of hours of operation, in hours per day.

c. The rate of material handling, in tons per hour, calculated by dividing the number of tons handled per day (C.1.a) by the number of hours per day (C.1.b).

2. The permittee shall perform daily checks, when the emission unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also

note the following in the operations log:

a. The color of the emissions;

b. Whether the emissions are representative of normal operations;

c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. The total duration of any visible emission incident; and

e. Any corrective actions taken to eliminate the visible emissions.

3. The permittee shall collect and record the amount of material handled from the elevator, to the enclosed belt conveyor, to the silos, to the enclosed screw conveyor/mixer and to the elevator, in tons per year, for each calendar year.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit a deviation (excursion) report that identifies all periods of time when the particulate control device was not in operation when materials were handled in this emissions unit.

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

E. Testing Requirements

1. Emission Limitation:
Particulate emissions shall not exceed 0.64 lb/hour

Applicable Compliance Method:
Compliance with the hourly particulate emission limitation shall be determined by the following equation:

E = A x EF x (1 - CE)

where;

E = Emissions rate, in lb/hr

A = Hourly material handling rate, in tons per hour, as recorded in Section C.1.c

EF = Ohio RACM Table 2.12-1 provides an emission factor of 0.2 lb PM/ton for material handling operations.

CE = Control efficiency of the particulate control device.

If required by the Ohio EPA, compliance with the allowable particulate emission limit shall also be determined in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

2. Emission Limitation:
Particulate emissions shall not exceed 0.7 ton/yr

Applicable Compliance Method:
Compliance with the annual particulate emission limitation shall be determined by the following equation:

E = A x EF x ton/2,000 lbs x (1 - CE)

where;

E = Emissions rate, in lb/hr

A = Hourly material handling rate, in tons per hour, as recorded in Section C.1.c

EF = Ohio RACM Table 2.12-1 provides an emission factor of 0.2 lb PM/ton for

material handling operations.

CE = Control efficiency of the particulate control device.

3. Emission Limitation:
Visible particulate emissions from the stack serving this emissions unit shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
If required by the Ohio EPA, compliance with the visible particulate emission limitation shall be determined in accordance with test method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996.

4. Emission Limitation:
Visible fugitive particulate emissions from the material handling operations shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:
Compliance with the visible fugitive emission limitation for the material handling operations shall be determined in accordance with test method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None