



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-17813

DATE: 6/3/2003

Kurtz Bros., Inc. (Wickliffe Composting)
Bruce Bailey
6415 Granger Rd.
Independence, OH 44131

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 6/3/2003
Effective Date: 6/3/2003**

FINAL PERMIT TO INSTALL 02-17813

Application Number: 02-17813
APS Premise Number: 0243151350
Permit Fee: **\$2000**
Name of Facility: Kurtz Bros., Inc. (Wickliffe Composting)
Person to Contact: Bruce Bailey
Address: 6415 Granger Rd.
Independence, OH 44131

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1290 E. 289th St
Wickliffe, Ohio**

Description of proposed emissions unit(s):
roadways, material storage piles, material handling.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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.

Kurtz Bros., Inc. (Wickliffe Composting)

PTI Application: 02-17813

Issued: 6/3/2003

Facility ID: 0243151350

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
PE

Tons Per Year
21.1

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - unpaved roadways and parking areas throughout composting facility	OAC rule 3745-31-05(A)(3)	There shall be no visible emissions from any unpaved roadway or unpaved parking area except for a period of time not to exceed three minutes during any sixty-minute observation period.
	OAC rule 3745-17-07(B)	The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b through A.2.g).
	OAC rule 3745-17-08(B)	Particulate emissions shall not exceed 14.2 TPY. The visible emission limitation in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
		The control requirements in this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

8

Kurtz

PTI A

Issued: 6/3/2003

Emissions Unit ID: **F001**

- 2.a** The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways:

all unpaved roadways at the facility

unpaved parking areas:

all unpaved parking areas at the facility

- 2.b** The permittee shall employ best available control measures on all unpaved roadways and parking areas 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 treat the unpaved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** 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 an unpaved 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled by flushing. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to a visible emission limitation of no visible particulate emissions except for one minute during any sixty-minute observation period.
- 2.e** 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.
- 2.f** 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.

- 2.g 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.

B. Operational Restrictions

none

C. Monitoring and/or Record Keeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of the unpaved roadways and parking areas in accordance with the following frequencies:

<u>unpaved roadways</u>	<u>minimum inspection frequency</u>
all unpaved roadways site)	daily (except for days where there is no vehicular activity at the

<u>unpaved parking areas</u>	<u>minimum inspection frequency</u>
all unpaved parking areas site)	daily (except for days where there is no vehicular activity at the

- 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, except if the next required inspection is the next day.
- 3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, 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 measure(s);
- c. the dates the control measure(s) were implemented; and
- d. on a calendar quarter basis, the total number of days the control measure(s) were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 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 (exceedance) 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; and
 - 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. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined by the following methods:
 - a. Compliance with the emission limitation for the unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,") as such Appendix existed on July 1, 1996.
 - b. Emission Limitation:

Particulate emissions shall not exceed 14.2 TPY.

Applicable Compliance Method:

Compliance with the above annual particulate emission limitation shall be determined by the following equation from AP-42, Chapter 13.2.2 (Unpaved Roads), Fifth Edition, dated 9/1998:

$$E = k \times (S/15) \times (s/12)^{0.8} \times (W/3)^{0.5} \times [(365-p)/365] / (M/2)^{0.4} \times VMT \times (1/2,000) \times (1-CE)$$

where:

E = annual particulate emission rate;

k = constant, 10;

S = mean vehicular speed, 15 mph;

s = silt content, 8.5%;

W = mean vehicular weight, 22 tons;

p = number of days with at least 0.1 inches of precipitation per year, 150;

M = moisture content of road material, 0.2;

VMT = vehicular miles traveled per year, 2,680

CE = fractional control efficiency, 0.60.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
F002 - load-in and load-out of storage piles (see section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-08(B)
wind erosion from storage piles (see section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	
load-in and load-out of storage piles and wind erosion from storage piles	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(B)	

Kurtz**PTI A****Issued: 6/3/2003**Emissions Unit ID: **F002**

Applicable Emissions
Limitations/Control Measures

There shall be no visible emissions of fugitive dust except for a period of time not to exceed one minute during any sixty-minute observation period.

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b, A.2.c, and A.2.f).

There shall be no visible emissions of fugitive dust except for a period of time not to exceed one minute during any sixty-minute observation period.

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.d through A.2.f).

Particulate emissions shall not exceed 6.1 TPY from wind erosion and load-in and load-out operations.

The visible emission limitation in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).

The control requirements in this

rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

- yard waste
- compost
- topsoil
- mulch
- any materials stored in piles that are ultimately blended with any of the above materials (e.g., spent foundry sand)
- any other materials stored in piles at the facility

2.b The permittee shall employ best available control measures for all load-in and load-out operations associated with the storage piles 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 watering the storage piles as needed and minimizing drop height to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c The above-mentioned control measures shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection 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 any such operation until further observation confirms that use of the measure is unnecessary.

2.d The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles 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 watering the storage piles as needed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The above-mentioned control measures shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures shall not be necessary for a storage pile 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.

- 2.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 requirements of OAC rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

- 1. The permittee shall comply with the following operational restrictions in order to reduce nuisance odors in accordance with OAC rule 3745-15-07:
 - a. At no time between March 1st and November 30th, shall yard waste have been stored for more than 3 months before the yard waste is processed through a grinder.
 - b. The height and width of the compost piles* (windrows) shall be limited to 15 feet and 20 feet, respectively.
 - * Compost piles are defined as those piles that have been processed through a grinder.
 - c. The permittee shall compost with controlled biological decomposition of organic solid wastes under predominately aerobic conditions and at temperatures conducive to maintaining an aerobic environment within the piles. In order to achieve this, the frequency of turning of the compost piles shall be in accordance with sound composting practices.

C. Monitoring and/or Record Keeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all piles	daily (for all days that a load-in activity occurs)
- 2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
all piles	daily (for all days that a load-out activity occurs)
- 3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces

associated with each storage pile in accordance with the following frequencies:

storage pile identification
all piles

minimum wind erosion inspection frequency
daily (for all days that normal operations occur on site)

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity 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.
5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile and for wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, 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.
7. 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 measure(s);
 - c. the dates the control measure(s) were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

Kurtz Bros., Inc. (Wickliffe Composting)

PTI Application: 02-17012

Issued

Facility ID: 0243151350

Emissions Unit ID: F002

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

8. The permittee shall perform weekly checks of the windrows to determine if the height and width of the piles are in compliance with the operational restrictions above.
9. The permittee shall maintain monthly records of the following:
 - a. all dates that the grinder was on site and processing yard waste;
 - b. all dates that a weekly check of the windrows is performed and whether the piles met the size restrictions contained in the operational restrictions above on that date; and
 - c. all dates that the piles were turned (piles shall be identified in a manner such that an Ohio EPA inspector can verify which piles were turned on specific dates).

D. Reporting Requirements

1. The permittee shall submit deviation (exceedance) 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;
 - c. each day when, on that day, yard waste has been stored for more than 3 months without processing as described in section B.1. of these terms and conditions; and
 - d. each day when the dimensions of the piles (windrows) exceeded the restrictions in section B.1. of these terms and conditions.
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. Compliance with the emission limitations specified in section A.1. of these terms and conditions

shall be determined in accordance with the following methods:

- a. Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.
- b. Emission Limitation:
 Particulate emissions shall not exceed 6.1 TPY from wind erosion and load-in and load-out operations.

Applicable Compliance Method:

Compliance with the above annual particulate emission limitation shall be determined by the following equations:

from AP-42, Chapter 13.2.4 (Aggregate Handling and Storage Piles), Fifth Edition, dated 1/1995, for load -in and load-out operations,

$$EI = k \times 0.0032 \times [(U/5)^{1.3} / (M/2)^{1.4}] \times P / 2,000$$

where:

EI = annual particulate emission rate (TPY);

k = particle size multiplier (dimensionless), 0.74 for PE;

U = mean wind speed, 10.8 mph;

M = material moisture content, 3% (yard waste), 40% (compost), and 14% (topsoil);

P = maximum annual process rate, in tons/yr, 15,000 TPY (yard waste), 13,333 TPY (compost), and 15,887 TPY (topsoil); and

and from USEPA's Control of Open Fugitive Dust Sources September 1988 for wind erosion from storage piles:

$$Ew = 1.7 \times (s/1.5) \times [(365-p)/235] \times (f/15) \times 365 \times A / 2,000$$

where:

Ew = total annual particulate emission rate;

s = silt content of the stored material, weight percent, 3% (yard waste), 3% (compost), 9.2% (topsoil);

p = number of days with > 0.01 inches of precipitation per year, 150 days;

f = percentage of time wind speed exceeds 12 mph, 30%; and

A = total surface area of storage piles, in acres, 1.0 (yard waste), 3.5 (compost), and 1.5 (topsoil).

Kurtz Bros., Inc. (Wickliffe Composting)

PTI Application: 02-17812

Issued

Facility ID: 0243151350

Emissions Unit ID: F002

For total particulate emissions:

$$E = [\text{sum of particulate emissions from each load-in/load-out operation (El)}] + [\text{total annual particulate emissions from wind erosion (Ew)}]$$

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - material handling operations	OAC rule 3745-31-05(A)(3)	Visible emissions of fugitive dust from any material handling operation shall not exceed 10% opacity, as a three-minute average, except as specified by rule.
		Particulate emissions of fugitive dust from this emissions unit shall not exceed 0.8 TPY.
		The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.d).
	OAC rule 3745-17-07(B)(1)	The visible emission limitation in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	The control measure requirements established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

all handling of yard waste, compost, topsoil, mulch, or any other materials; normally, but not exclusively, performed using a front-end loader

- 2.b** The permittee shall employ best available control measures for the above-identified material handling operation(s) 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 perform the following control measure(s) to ensure compliance:

treating the piles with water and minimizing the drop height of the front-end loader

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

- 2.c** 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 unnecessary.

- 2.d** Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

none

C. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations daily.

2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, 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;
 - 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.

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; and
 - b. each instance when a control measure, that was to be performed 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. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Kurtz Bros., Inc. (Wickliffe Composting)

PTI Application: 02-17912

Issued

Facility ID: 0243151350

Emissions Unit ID: F003

- a. **Emission Limitation:**
Visible emissions of fugitive dust from any material handling operation shall not exceed 10% opacity, as a three-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the above visible emission limitation shall be determined by Method 9 of 40 CFR, Part 60, Appendix A, except that the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible particulate emission observations recorded at fifteen-second intervals.

- b. **Emission Limitation:**
Particulate emissions of fugitive dust from this emissions unit shall not exceed 0.8 TPY.

Applicable Compliance Method:

Compliance with the above annual particulate emission limitation shall be determined by the following equations:

from AP-42, Chapter 13.2.4 (Aggregate Handling and Storage Piles), Fifth Edition, dated 1/1995,

$$EI = k \times 0.0032 \times [(U/5)^{1.3} / (M/2)^{1.4}] \times P / 2,000$$

where:

EI = annual particulate emission rate (TPY);

k = particle size multiplier (dimensionless), 0.74 for PE;

U = mean wind speed, 10.8 mph;

M = material moisture content, 3% (yard waste), 40% (compost), and 14% (topsoil);

P = maximum annual process rate, in tons/yr, 15,000 TPY (yard waste), 13,333 TPY (compost), and 15,887 TPY (topsoil)

F. Miscellaneous Requirements

none