



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MAHONING 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: 02-19650

DATE: 7/20/2004

Mar-Zane, Inc., Plant 28
Ronald P. Morrison
P.O. Box 1585
Zanesville, OH 43704

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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: 7/20/2004
Effective Date: 7/20/2004**

FINAL PERMIT TO INSTALL 02-19650

Application Number: 02-19650
APS Premise Number: 0250110985
Permit Fee: **\$1200**
Name of Facility: Mar-Zane, Inc., Plant 28
Person to Contact: Ronald P. Morrison
Address: P.O. Box 1585
Zanesville, OH 43704

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2800 Center Street
Youngstown, Ohio**

Description of proposed emissions unit(s):
Material handling, aggregate storage piles, roadways and parking areas.

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

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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.

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14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	72.22
PM10	14.75

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 - Material Handling Operations	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE): 8.09 TPY Particulate matter less than 10 microns in diameter (PM10): 3.87 TPY
	OAC rule 3745-17-07(B)(1)	Visible PE from any material handling operation shall not exceed 10% opacity, as a three-minute average. 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 3745-17-08(B)	The visible emission limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3). The control measure requirements established in 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 material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

All material handling operations including, but not limited to, handling of sand, aggregate, and recycled asphalt aggregates.

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 handling only material with inherently high moisture content or employing dust suppressant and minimize drop height distance from front-end loader(s) to truck beds, stock piles, and/or aggregate cold feed bins. 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 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping 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 in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
All material handling 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 of 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:

- 1.a Emission limitation:
 8.09 tons of PE per year

Applicable compliance method:
 Compliance shall be determine by the following equation:

$$Er = A + [2.1 * C * D] / 2000 \text{ lbs per ton}$$

Where:

Er = Emission rate, in tons per year

A = calculated fugitive PE rate using AP-42 emission factor equation for material handling (section 13.2.4. (1/95 version)), 1.79 TPY. The calculated PE rate was determined by calculating the PE from each transfer point, as specified on the permit application.

2.1 = multiplying factor to convert to PE from PM10

C = maximum annual asphalt production, 400,000 tons

D = AP-42 emission factor, 0.015 lb of PM10/ton (Table 11.19.2-2, 1/95 version)

- 1.b Emission limitation:
 3.87 tons of PM10 per year

Applicable compliance method:
 Compliance shall be determine by the following equation:

$$Er = A + [C * D] / 2000 \text{ lbs per ton}$$

Where:

Er = Emission rate, in tons per year

A = calculated fugitive PM10 emission rate using AP-42 emission factor equation for material handling (section 13.2.4. (1/95 version)), 0.87 TPY. The calculated PM10 emission rate was determined by calculating the PM10 from each transfer point, as specified on the permit application. C = maximum annual asphalt production, 400,000 tons

D = AP-42 emission factor, 0.015 lb of PM10/ton (Table 11.19.2-2, 1/95 version)

- 1.c Emission limitation:
 10% opacity, as a three-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on

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PTI A

Issued: 7/20/2004

Emissions Unit ID: **F001**

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

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PTI A

Issued: 7/20/2004

Emissions Unit ID: F002

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),(B)(6)
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)(6)	

Applicable Emissions
Limitations/Control Measures

There shall be no visible emissions except for a period of time not to exceed one minute in any hour.

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 except for a period of time not to exceed one minute in any hour.

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 (PE): 5.44
TPY
Particulate matter less than 10
microns in diameter (PM10): 5.23
TPY

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

The control measure requirements established in 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 storage piles that are covered by this permit and subject to the above-mentioned requirements are listed below:

All material storage piles

- 2.b** The permittee shall employ best available control measures on 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 minimize drop height for load-in and load-out operations 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 measure(s) 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 measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) 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 maintains that the inherent moisture content of the materials is at a level which is more than sufficient to comply with all applicable requirements. If at any time the moisture content is not sufficient to meet the above applicable requirements, the permittee shall employ best available control measures to ensure compliance.
- 2.e** The above-mentioned control measure(s) 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 measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) 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

None

C. Monitoring and/or Recordkeeping 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	weekly

- 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	weekly

- 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:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
all	weekly

- 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

Emissions Unit ID: **F002**

specified in this permit for load-in and load-out of a storage pile, and 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 measures;
 - c. the dates the control measures were implemented; and,
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and, 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 measure(s).

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.

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; 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 in accordance with the following methods:

- 1.a Emission limitation:
5.44 tons of PE per year
5.23 tons of PM10 per year

Applicable compliance method:

Compliance can be determined by the following equations:

$$E_r = [2A*B + C*D*F] [1 \text{ ton}/2000 \text{ lbs}]$$

Where:

E_r = PE rate in tons per year.

A = emission rate for drop batch operation: (AP-42, section 13.2.4-3, January '95 version)

$$A = k(0.0032)[(U/5)^{1.3} / (M/2)^{1.4}]$$

Where

E = emission factor (lbs/ton)

k = particular size multiplier (0.74 for PE; 0.35 for PM10)

U = mean wind speed (mph)

M = material moisture content (%)

B = annual 12-month summation of material handled

C = emission rate for wind erosion: (Using AP-42, Section 11.2.3, Eq (3)) (May, '83 version)

$$C = 1.7 (s/1.5)[(365-p)/235](f/15) \text{ (lb/day/acre)}$$

Where:

E = total suspended particulate emission factor (lb/day/acre)

s = silt content of aggregate (%) (10%)

p = number of days with > or = to 0.25 mm (0.01 in.) of precipitation per year (150 days)

f = percentage of time that the unobstructed wind speed exceeds 5.4 m/s (12 mph) at the mean pile height. (Assume 10%)

D = number of days in a year, 365 days

F = number of acres of storage piles, 4.0 acres

(All PE from wind erosion assumed to be PM10)

- 1.b Emission limitation:
There shall be no visible emissions except for a period of time not to exceed one minute in any hour.

Applicable Compliance Method:

Compliance with the visible emission limitation 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 ("Standard of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraph (B)(4)(a) through (B)(4)(c) 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.

<u>Operations, Property, and/or Equipment</u>	Unpaved roadways and parking areas (see Section A.2.b)	<u>Applicable Rules/Requirements</u>
F003 - Plant roadways and parking areas		OAC rule 3745-31-05(A)(3)
Paved roadways and parking areas (see Section A.2.a)		OAC rule 3745-31-05(A)(3)
		OAC rule 3745-17-07(B)(4)
		OAC rule 3745-17-08(B), (B)(8), (B)(9)

OAC rule 3745-31-05(A)(3)

Applicable Emissions
Limitations/Control Measures

Particulate emissions (PE): 58.69
TPY

Particulate matter less than 10
microns in diameter (PM10): 5.65
TPY

There shall be no visible emissions
except for a period of time not to
exceed one minute in any hour.

OAC rule 3745-17-07(B)(5)

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

OAC rule 3745-17-08(B), (B)(2)

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

The control measure requirements
established in this rule are less
stringent than the requirements
established pursuant to OAC rule
3745-31-05(A)(3).

There shall be no visible emissions
except for a period of time not to
exceed three minutes in any hour.

The permittee shall employ best
available control measures that are
sufficient to minimize or eliminate
visible emissions of fugitive dust

(see Sections A.2.e through A.2.j).

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

The control measure requirements
established in 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 paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways:

all paved roadways

paved parking areas:

all paved parking areas

- 2.b** 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

unpaved parking areas:

all unpaved parking areas

- 2.c** The permittee shall employ best available control measures on all paved 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 paved roadways and parking areas by 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.d** The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways 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 shoulders of all paved roadways 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.e** 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

Emissions Unit ID: **F003**

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.f** 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 a paved or 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.g** 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 with the control measure(s) specified above for paved surfaces. 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 the visible emission limitation for paved roadways and parking areas.
- 2.h** 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.i** 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.j** 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 Recordkeeping Requirements

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

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all paved roadways and parking areas once during each day of operation	
<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all unpaved roadways and parking areas once during each day of operation	
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 within one week.
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 measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, 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, 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 in accordance with the following methods:
 - 1.a Emission Limitation:
58.69 ton of PE per year

 Applicable Compliance Method:
 This emission limitation was developed by applying a 80% and 90% control efficiency on unpaved and paved roadways, respectively, to a maximum potential uncontrolled emission rate of 90.01 TPY PE. The maximum potential uncontrolled emission rate was calculated using AP-42 emission factors for paved and unpaved roadways [section 13.2.1. (12/03) and section 13.2.2. (12/03)] and the following maximum vehicle miles traveled:

 paved roadways - 29,000 miles
 unpaved roadways - 13,333.33 miles

 Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the ton per year PE limitation will be assumed
 - 1.b Emission Limitation:
5.65 ton of PM10 per year

 Applicable Compliance Method:

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This emission limitation was developed by applying a 80% and 90% control efficiency on unpaved and paved roadways, respectively, to a maximum potential uncontrolled emission rate of 21.99 TPY PM10. The maximum potential uncontrolled emission rate was calculated using AP-42 emission factors for paved and unpaved roadways [section 13.2.1. (12/03) and section 13.2.2. (12/03)] and the following maximum vehicle miles traveled:

paved roadways - 29,000 miles

unpaved roadways - 13,333.33 miles

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the ton per year PE limitation will be assumed

1.c

Emission Limitation:

There shall be no visible emissions except for a period of time not to exceed one minute in any hour.

Applicable Compliance Method:

Compliance with the emission limitation for the paved and 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, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None