

Facility ID: 0285010434 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0285010434 Emissions Unit ID: F001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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 - Storage piles, including load-in, load-out and wind erosion activities for facilities with a maximum production of 3,000,000 tons/year and a maximum storage pile surface area less than or equal to 6 acres	OAC rule 3745-31-05 (A)3 PTI No. 02-21710	3.1 tons/year of fugitive particulate matter of 10 microns or less (PM10)
		6.4 tons/year of fugitive particulate emissions (PE)
		no visible PE except for one minute during any 60-minute period
		best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See Sections A.2.a through A.2.e)
	OAC rule 3745-17-07 (B)(1)	Exempt.
	OAC rule 3745-17-08 (B)	See section A.2.f of these terms and conditions. Exempt.
		See section A.2.g of these terms and conditions.

2. Additional Terms and Conditions

- (a) 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 application, the permittee has committed to maintain minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.

The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

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.

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. The permittee shall water the storage piles as needed and minimize drop heights to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

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.

Implementation of the above-mentioned control measures in accordance with the terms and conditions

of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3).

In accordance with OAC rule 3745-17-07 (B)(1)(d), OAC rule 3745-17-07 (B)(1) shall not apply to any fugitive emissions units which are exempted from the requirements of OAC rule 3745-17-08 (B).

The facility is not located at Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-08 (A)(1), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B).

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. 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 created from a mixture of cow manure and other materials such as sawdust, and/or bark fines.

- b. 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:

storage pile identification minimum load-in inspection frequency

all daily

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:

storage pile identification minimum load-out inspection frequency

all daily

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 minimum wind erosion inspection frequency

all daily

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 wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

6. 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 6.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.

7. 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.

8. The permittee shall maintain monthly records of the following:

- a. 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

- b. 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 quarterly 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; and
 - c. 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 in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emissions Limitations:
 - 3.1 tons/year of fugitive PM10
 - 6.4 tons/year of fugitive PE
 - Applicable Compliance Method:
 - Compliance with fugitive PE limitations shall be determined by using the emission factor equations in Sections 13.2.4 and 13.2.5, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 1/95), for load-in operations, load-out operations, and wind erosion. These emission limits in this permit were based on a maximum production of 3,000,000 tons per year, a maximum storage surface area less than or equal to 6 acres, and a 95 % overall control efficiency for PE and PM10.
 - b. Emission Limitation:
 - There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period.
 - Applicable Compliance Method:
 - Compliance with the visible PE 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").
- F. **Miscellaneous Requirements**
 - 1. None