



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
TRUMBULL 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: 02-16802

DATE: 9/5/2002

TRANSFLO Terminal Services, Inc
Jan Barnes
6735 Southpoint Drive South , J-975
Jacksonville, FL 32216

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



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 9/5/2002
Effective Date: 9/5/2002**

FINAL PERMIT TO INSTALL 02-16802

Application Number: 02-16802
APS Premise Number: 0278080779
Permit Fee: **\$1400**
Name of Facility: TRANSFLO Terminal Services, Inc
Person to Contact: Jan Barnes
Address: 6735 Southpoint Drive South , J-975
Jacksonville, FL 32216

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5232 Tod Ave., Unit 14
Warren, Ohio**

Description of proposed emissions unit(s):
Rail car bottom dumping, truck unloading, loading rack.

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 Related to Monitoring and Recordkeeping 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

TRANSFLO Terminal Services, Inc
PTI Application: 02-16802
Issued: 9/5/2002

Facility ID: 0278080779

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

TRANSFLO Terminal Services, Inc
PTI Application: 02-16802
Issued: 9/5/2002

Facility ID: 0278080779

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>
Particulate Emissions(PE)	26.5
Organic Compound Emissions(OC)	9.0

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 - transfer of bulk solids between rail cars and trucks portable conveyors with dust collectors	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07 (B) OAC rule 3745-17-08	PE: 3.7 pounds per hour and 16.0 tons per year. Visible PE shall not exceed twenty-percent opacity as a three minute average, except as provided by the rule. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack(s) and fugitive egress point(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an

operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. whether the emissions are representative of normal operations;
- b. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- c. the total duration of any visible emissions incident; and
- d. any corrective action(s) taken to eliminate the visible emissions.

D. Reporting Requirements

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

E. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: 20% opacity, as a 3 minute average .

Applicable Compliance Method: Compliance with the visible emission limitation for the fugitive particulate emissions shall be determined in accordance with Test Method 9 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)(3) and (B)(3)(b) of OAC rule 3745-17-03.

- b. Emission Limitation: 3.7 lb/hr and 16.0 ton/yr PE

Applicable Compliance Method: Compliance shall be based on a one time calculation by using emission factors from AP-42, Section 11.17 (2/98) for product loading (0.61 lb/ton loaded), and the maximum unloading rate of 60 tons per hour.

$E(PE) = 0.61 \text{ lb/ton} \times 60 \text{ ton/hr} \times \text{control efficiency}$,

where control efficiency is estimated at 90% or (1-.90 for formula).

Tons per year is determined by multiplying E(PE)total in lbs/hr by 8760 hr/yr and dividing by 2000 lbs/ton.

If required compliance shall be demonstrated as listed in OAC Rule 3745-17-03(B)(10).

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
F002 - transfer of bulk solids between rail cars and trucks using backhoes, front end/bucket loaders (construction and demolition waste)	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 6.3 ton per year.
	OAC rule 3745-17-07 (B)	Visible particulate emissions from material handling shall not exceed six minutes during any sixty-minute observation period.
	OAC rule 3745-17-08 (B)	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)
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

11

TRAN

PTI A

Issued: 9/5/2002

Emissions Unit ID: **F002**

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

the load out of rail cars
the load in of trucks

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:

material handling operation(s)

control measure(s)

the load out of rail cars
supression
the load in of trucks
the

the use of water and/or suitable dust
chemicals to control dust emissions during
unloading of rail cars and the loading of
trucks,
and minimizing drop height distance to truck
bed

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

1. There shall be no open burning, in violation of OAC Chapter 3745-19, at this facility.
2. The following asbestos requirements are to be met:

- a. The facility shall not accept or dispose of any National Emission Standards for Hazardous Air Pollutants (NESHAP) Regulated Asbestos Containing Material (RACM) as defined in the NESHAP Regulation for Asbestos, 40 CFR Part 61, Subpart M, Section 141 amended June 19, 1995, or in any subsequent revisions or as defined in any Environmental Protection Agency Interpretive Rules concerning the NESHAP Regulation for Asbestos. This includes:
 - i. friable asbestos material,
 - ii category I nonfriable asbestos containing material that has become friable,
 - iii category I nonfriable asbestos containing material that will be or has been subjected to sanding, grinding, cutting, or abrading, or
 - iv category II nonfriable asbestos containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.

- 3. This facility shall be limited to accepting , only construction and demolition debris (C&DD) material as defined in Ohio Revised Code 3714.01(C).

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records of the following information:
 - a. the number of rail cars unloaded;
 - b. the number of trucks loaded; and
 - c. the approximate weight of material transfer from rail cars to trucks, in tons per day.

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

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
the load out of rail cars	daily
the load in of trucks	

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

TRANSFLO Terminal Services, Inc
PTI Application: 02-16902
Issued

Facility ID: 0278080779

Emissions Unit ID: F002

conditions.

4. 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.

5. The permittee shall maintain records of the following information:
 - a. the presence or absence of any visible fugitive emissions shall be noted;
 - b. if visible emissions are observed, the permittee shall also note the following;
 - c. whether the emissions are representative of normal operations;
 - d. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - e. the total duration of any non representative visible emission incident;
 - f. the date and reason any required inspection was not performed;
 - g. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - h. the dates the control measure(s) was (were) implemented; and
 - i. 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 an annual report which summarizes the following:
 - a. the number of rail cars unloaded;
 - b. the number of trucks loaded; and
 - c. the approximate weight of material transfer from rail cars to trucks, in tons per year.

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

- a. identify all days during which any non representative visible fugitive particulate emissions were observed from this emissions unit;

- b. describe any corrective actions taken to minimize or eliminate the non representative visible fugitive particulate emissions.
 - c. each day during which an inspection was not performed by the required frequency; and
 - d. 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. Emissions Limitation:
Visible emissions shall not exceed six minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance with the visible emissions limitations for material handling 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)(c) of OAC rule 3745-17-03.

2. Emissions Limit:
6.28 ton per year of PE

Applicable Compliance Method:

Compliance shall be based on the following calculation using AP-42 Chapter 13.2.4.2, equation 1 (January 1995). The calculation is as follows to emit:

$$E = k \times (0.0032) \times (U/5)^{1.3} / (M/2)^{1.4} \times 4 \text{ lb/tons of ton of material loaded}$$

Where:

k is a constant, 0.74 for PE

U is the mean wind speed for the area (15)

M is the moisture content (estimated at 4.0)

4 is for 4 load points, 2 loading areas each with load out and load in.

$$E = 0.0148 \text{ lb/tons of material loaded}$$

TRANSFLO Terminal Services, Inc

PTI Application: 02-16902

Issued

Facility ID: 0278080779

Emissions Unit ID: **F002**

$E(\text{annual}) = 0.0148 \text{ lb/tons} \times \text{annual estimate of weight of material transfer from rail cars to trucks from C.1.}$

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>
T001 - bulk organic liquid transfer between rail cars and tanker trucks using submerged fill	OAC rule 3745-31-05(A)(3)	9 TPY of organic compound (OC) emissions see B.1, B.2, and B.3

2. Additional Terms and Conditions

- 2.a None

B. Operational Restrictions

1. The transfer of any organic liquid from a delivery vessel to a receiving vessel or tank shall be conducted by use of submerged fill into the receiving vessel or tank. The submerged fill pipe(s) are to be installed so they are within six (6) inches of the bottom of the receiving vessel or tank.
2. The organic liquid material transferred per year shall not exceed three (3) million gallons.
3. The vapor pressure of any organic liquid material transferred at this emissions unit shall not exceed 2 pounds per square inch absolute.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The types of organic liquids transferred in this emissions unit.

- b. The annual throughput of any organic liquids transferred in this emissions unit.
- c. The maximum true vapor pressure (in pounds per square inch absolute), as stored, of each organic liquid transferred in this emissions unit that has a maximum true vapor pressure greater than 2.0 pound per square inch absolute.

D. Reporting Requirements

1. If the permittee transfers any organic liquids with a true vapor pressure which is greater than 2.0 pounds per square inch absolute, the permittee shall notify the Director (the Northeast District Office) within 30 days of becoming aware of the occurrence.
2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission Limitation: 9.0 ton/yr OC

Applicable Compliance Method: Compliance shall be based on a calculation using an emission factor formula from AP-42, Sec. 5.2:

$$L = 12.46(P \times M \times S/T), \text{ where}$$

L = lb OC/ 1000 gal material transferred

S = 1, factor for submerged file form Sec. 5.2

P = true vapor pressure in pounds per square inch absolute, a maximum of 2 is allowed

M = molecular weight, assume 130 for worst case

T = temperature, assume 540 degrees F for an average

$$L = 6.0 \text{ lb OC/ } 1000 \text{ gal}$$

Annual emissions are determined by multiplying L by the annual throughput of any organic liquids transferred in this emissions unit from C.1 above.

F. Miscellaneous Requirements

None