



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:
50 West Town Street, Suite 700

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 08-04892

Fac ID: 0857041905

DATE: 12/6/2007

SRI Inc.
Daniel Feucht
1550 Soldiers Home W. Carrollton Rd.
Dayton, OH 45418

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

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

CC: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 12/6/2007
Effective Date: 12/6/2007**

FINAL PERMIT TO INSTALL 08-04892

Application Number: 08-04892
Facility ID: 0857041905
Permit Fee: **\$2200**
Name of Facility: SRI Inc.
Person to Contact: Daniel Feucht
Address: 1550 Soldiers Home W. Carrollton Rd.
Dayton, OH 45418

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1550 Soldiers Home-W. Carrollton Rd.
Dayton, Ohio**

Description of proposed emissions unit(s):
Portable crusher plant, portable diesel generator, and storage piles.

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

Chris Korleski
Director

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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

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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)

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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.

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	28.28
PM10	12.36
NOx	23.33
CO	2.96
SO2	0.50

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0.54

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (B001) - portable 1000 kW diesel generator

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The nitrogen oxides (NO _x) emissions from this emissions unit shall not exceed 16.97 lb/hr.
OAC rule 3745-31-05(A)(3)(b)	The uncontrolled potential to emit for particulate emissions (PE), sulfur dioxide (SO ₂), carbon monoxide (CO), and organic compound (OC) emissions from this emissions unit is less than ten tons per year.
OAC rule 3745-31-05(C) (operating restriction to avoid air toxics modeling, state only enforceable)	The nitrogen oxides (NO _x) emissions from this emissions unit shall not exceed 23.33 tons/year. See section B.2.
OAC rule 3745-17-11(B)(5)(a)	The PE from this emissions unit shall not exceed 0.62 lb/mmBTU actual heat input.
OAC rule 3745-18-06(B)	See section A.2.a.
OAC rule 3745-17-07(A)(1)	Except as provided by rule, visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average.
OAC rule 3745-21-08(B)	See section A.2.b.

2. Additional Terms and Conditions

- 2.a This rule specifies fuel burning equipment, stationary gas turbines, jet engine test stands and stationary internal combustion engines which have rated heat input capacities equal to, or less than, ten MM Btu per hour total rated capacity are exempt from paragraphs (D), (F) and (G) of this rule and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.

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- 2.b** The design of the emissions unit and the technology associated with the current operating practices satisfy the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** The lb/hr emission limitations are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emission limitations.

B. Operational Restrictions

1. The permittee shall burn only No. 2 diesel fuel oil in this emissions unit.
2. The maximum annual hours of operation for this emission unit shall not exceed 2750 hours per year.

C. Monitoring and/or Record keeping Requirements

1. For each day during which the permittee burns a fuel other than No. 2 diesel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain record of the total hours of operation per year for this emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify each day when a fuel other than No. 2 diesel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

Emissions Unit ID: **B001**

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the annual operating hour limitation and anytime fuel other than No. 2 diesel oil was used. These reports shall be submitted (i.e., postmarked) annually to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in this permit for this emissions unit shall be determined in accordance with the following method(s):

- a. Emission Limitation-

The nitrogen oxides (NO_x) emissions from this emissions unit shall not exceed 16.97 lb/hr and 23.33 tons/year.

Applicable Compliance Method:

The hourly emission limitation was based upon the manufacturer's emission factor of 5.20 grams/HP-hour divided by 454 grams/lb and multiplying by the max brake horsepower of 1482 HP. The annual emission limitation was determined by multiplying the hourly emission rate limitation by the operating limitation of 2075 hr/year and dividing by 2000 lbs/ton. Compliance may be determined by the record keeping requirements specified in Sections C.2 of this permit.

- b. The particulate emissions (PE) from this emissions unit shall not exceed 0.062 lb/mmBTU actual heat input.

Applicable Compliance Method:

Compliance with this emissions limitation is demonstrated by using the manufacturer's emission factor of 0.19 grams/HP-hour divided by 454 grams/lb multiplying by the max brake horsepower of 1482 HP and then dividing by the maximum heat input of 10mmBTU/hr for the engine.

- c. Opacity Limitation-

The visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method-

Compliance with the visible emission limitation is presumed through the use of

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diesel fuel. If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the tests and procedures specified in USEPA Reference Method 9.

F. Miscellaneous Requirements

1. The permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI) providing the appropriate exemption requirements have been met and following the approval of the director. The director may issue a "Notice of

Site Approval" if the portable source meets the following criteria pursuant to OAC rule 3745-31-03(A)(1)(p)(i):

- a. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination and state and/or federal rules;
- b. the portable source is operating pursuant to a currently effective PTI and/or any applicable permit to operate (PTO) and continues to comply with the requirements of the permit;
- c. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation*;
- d. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance in violation of OAC rule 3745-15-07; and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site; and
- e. the director has issued a "Notice of Site Approval", stating that the proposed site is acceptable under OAC rule 3745-15-07 and the relocation will not result in the installation of a major stationary source or a modification of an existing major

Emissions Unit ID: **B001**

stationary source.

The portable source can be relocated upon receipt of the director's "Notice of Site Approval" for the site

2. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745- 77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (F005) - portable 700 ton per hour primary crusher skid plant with spray bar dust suppression system, including transfer conveyors and radial stackers

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (voluntary limits to avoid BAT)	The potential to emit has the potential to emit, taking into account air pollution controls installed on the source, for particulate emissions (PE), from this emissions unit is less than ten tons per year. See 2.a.
NSPS 40 CFR Part 60, Subpart OOO	The visible PE of fugitive dust shall not exceed 15% opacity, as a 6-minute average from the crushers. The visible PE of fugitive dust shall not exceed 10% opacity, as a 6-minute average from any screens, conveyors and transfer points.
OAC rule 3745-17-07(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The opacity limitation specified by this rule is less stringent than the emission limitation established pursuant to NSPS 40 CFR Part 60, Subpart OOO.
OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	(See Sections A.2.b and A.2.c.)

2. Additional Terms and Conditions

- 2.a The uncontrolled PTE of PE (all fugitive) for this emissions unit is 90.14 TPY and

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the after control PTE is 7.1 TPY. Permit to Install 08-04892 for this air contaminant source takes into account the following air pollution control equipment as proposed

by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. The use of a water spray bar dust suppression system at all times during operation of the crusher for the emissions unit.
- ii. The aggregate materials processed through the equipment identified under this emissions unit shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust so that compliance with the PE requirements specified above is continuously maintained. If the moisture in the aggregate is not sufficient to comply with the restrictions of this permit, the permittee shall apply water or other suitable dust suppressant, at appropriate locations in the production line.

- 2.b** The permittee shall employ control measures on the crusher, screens, conveyors and transfer points 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 feed loading to the emission unit and use of a water spray bar system at all times during operation of the emissions unit and the use of watering/sprinkling at sufficient treatment frequencies to ensure compliance. The aggregate materials processed through the equipment identified under this emissions unit shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust from the so that compliance with the opacity requirements specified above is continuously maintained. If the moisture in the aggregate is not sufficient to comply with the opacity restrictions of this permit, the permittee shall apply water or other suitable dust suppressant, at appropriate locations in the production line.

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.

- 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

Emissions Unit ID: **F005**

this permit. Implementation of the control measures shall not be necessary for the crusher, screens, conveyors and transfer points that are 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.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform daily inspections of the crushers, screens, conveyors and transfer points.
2. No inspections shall be necessary when the crushers, screens, conveyors and transfer points are covered with snow and/or ice 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 purpose of the inspection is to determine the need for implementing the above-mentioned control measures specified in this permit for crushers, screens, conveyors and transfer points. The inspections shall be performed during representative, normal crushing, screening, conveying and transfer points operating 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 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

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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 measure(s).

The information required in 5.d. shall be kept be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- 6. The initial compliance demonstration required by 40 CFR 60 Subpart OOO shall be completed within 60 days after reaching maximum production, and no later than 180 days after initial startup. The visible emissions evaluations shall be performed at maximum production capacity and during dry weather conditions. Every effort shall also be made to conduct the visible emissions evaluations under conditions that represent a worst case normal operating scenario. The duration of the Method 9 observations shall be in accordance with the requirements of 40 CFR 60 Subpart OOO.

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; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- 2. These quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
- 3. Pursuant to NSPS 40 CFR Part 60, Subpart OOO, the permittee shall submit the following information for each piece of equipment that is replaced having the same function as the existing facility:

Emissions Unit ID: **F005**

- a. for a crusher, grinding mill, bucket elevator, bagging operation, storage bin, enclosed truck or railcar loading station:
 - i. the rated capacity in tons or tons per hour of the existing facility being replaced, and
 - ii. the rated capacity in tons or tons per hour of the replacement equipment.
- b. for a conveyor belt:
 - i. the width of the existing conveyor belt being replaced, and
 - ii. the width of the replacement conveyor belt.
- c. for a screening operation:
 - i. the total surface area of the top screen of the existing screening operation being replaced, and
 - ii. the total surface area of the top screen of the replacement, screening operation.
- d. The permittee shall submit the date of manufacture of each existing facility being replaced and the date of manufacture of the replacement equipment.

The notification shall be submitted 30 days (or as soon as practicable) before construction of the replacement equipment is commenced.

4. Pursuant to NSPS 40 CFR Part 60, Subpart OOO, the permittee is required to report the following milestones:
 - a. construction date;
 - b. actual start-up date;
 - c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protections Agency
DAPC - Air Quality Modeling and Planning

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P.O. Box 1049
Columbus, Ohio 43216-1049

and

The Regional Air Pollution Control Agency
117 S. Main Street
Dayton, Ohio 45422-1280

E. Testing Requirements

1. Compliance with the emission limitations in this permit for this emissions unit shall be determined in accordance with the following method(s):

a. Emission Limitation-

The visible PE of fugitive dust shall not exceed 15% opacity, as a 6-minute average from the crushers.

Applicable Compliance Method-

Compliance shall be determined by visible emission evaluations performed using the methods and procedures specified in USEPA Reference Method 9 and NSPS 40 CFR 60.675 Subpart OOO.

b. Emission Limitation-

The visible PE of fugitive dust shall not exceed 10% opacity, as a 6-minute average from any unsaturated screens and transfer points.

Applicable Compliance Method-

Compliance shall be determined by visible emission evaluations performed using the methods and procedures specified in USEPA Reference Method 9 and 40 CFR 60.675 Subpart OOO.

c. Emission Limitation-

There shall be no visible PE from all saturated equipment except crushers.

Applicable Compliance Method-

Compliance with the visible PE limitation listed 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. The permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI) providing the appropriate exemption requirements have been met and following the approval of the director. The director may issue a "Notice of Site Approval" if the portable source meets the following criteria pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
 - a. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination and state and/or federal rules;
 - b. the portable source is operating pursuant to a currently effective PTI and/or any applicable permit to operate (PTO) and continues to comply with the requirements of the permit;
 - c. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation*;
 - d. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance in violation of OAC rule 3745-15-07; and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site; and
 - e. the director has issued a "Notice of Site Approval", stating that the proposed site is acceptable under OAC rule 3745-15-07 and the relocation will not result in the installation of a major stationary source or a modification of an existing major stationary source.

The portable source can be relocated upon receipt of the director's "Notice of Site Approval" for the site

2. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple

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portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745- 77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (F006) - portable aggregate storage piles, including load-in, load-out and wind erosion

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The particulate emissions (PE) from this emissions unit shall not exceed 20.33 tons/yr.</p> <p>There shall be no visible PE of fugitive dust except for one minute during any 60-minute period</p> <p>The permittee shall utilize best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See Sections A.2.a through A.2.e)</p>
OAC rule 3745-17-07(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	(See Sections A.2.a through A.2.e)

2. Additional Terms and Conditions

- 2.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

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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.

- 2.b** 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.c** 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 application, the permittee has committed to perform one or more of the following: (chemical stabilization, watering/sprinkling systems/hoses, covering the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** 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.e** 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).

B. Operational Restrictions

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None

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	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:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
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:

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

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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.

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; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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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. Emission Limitation:

The particulate emissions (PE) from this emissions unit shall not exceed 20.33 tons/yr.

Applicable Compliance Method:

Compliance shall be determined by summing the annual emission rates for the load-in, load-out, and wind erosion for the storage piles. (See i. through ii. below)

- i. The PE for load-in and load-out of storage piles (19.62 tons/year) was calculated by multiplying the emission factor of 0.0064 lbs PE/ton material [Equation 1 of Section 13.2.4 in Compilation of Air Pollutant Emission Factors, AP-42, , Fifth Edition, Volume I, (January 1995)] by the maximum annual material throughput (6,132,000 ton/year), and then dividing by 2000 pounds/ton.
- ii. The PE for wind erosion (0.71 tons/year) for the surfaces of all storage piles was calculated by multiplying the emission factor of 9.22 lb/acre/day [Equation 4-9 from the EPA document 450/3-88-008 "Control of Open Fugitive Dust Sources," Section 4.1.3 (September 1988)] by the maximum surface area of the storage piles (0.42 acres) times 365 days, and then dividing by 2000 pounds/ton.

- 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. The permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI) providing the appropriate exemption requirements have been met and following the approval of the director. The director may issue a "Notice of Site Approval" if the portable source meets the following criteria pursuant to OAC rule 3745-31-03(A)(1)(p)(i):
 - a. the portable source has been issued a permit to install (PTI) and the permittee continues to comply with any applicable best available technology (BAT) determination and state and/or federal rules;
 - b. the portable source is operating pursuant to a currently effective PTI and/or any applicable permit to operate (PTO) and continues to comply with the requirements of the permit;
 - c. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation*;
 - d. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance in violation of OAC rule 3745-15-07; and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site; and
 - e. the director has issued a "Notice of Site Approval", stating that the proposed site is acceptable under OAC rule 3745-15-07 and the relocation will not result in the installation of a major stationary source or a modification of an existing major stationary source.

The portable source can be relocated upon receipt of the director's "Notice of Site Approval" for the site

2. If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source.

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When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745- 77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

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