State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
ERIE COUNTY

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: 03-16102

DATE: 5/6/2004

Hanson Aggregates Mideast, Inc. - Wagner
Rolland Krueger
4203 Milan Road
Sandusky, OH 43560

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

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

CC: USEPA **NWDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 5/6/2004**
Terms and Conditions	**Effective Date: 5/6/2004**

FINAL PERMIT TO INSTALL 03-16102

Application Number:	03-16102
APS Premise Number:	0322020200
Permit Fee:	**$1200**
Name of Facility:	Hanson Aggregates Mideast, Inc. - Wagner
Person to Contact:	Rolland Krueger
Address:	4203 Milan Road Sandusky, OH 43560

Location of proposed air contaminant source(s) [emissions unit(s)]:
4203 Milan Road
Sandusky, **Ohio**

Description of proposed emissions unit(s):
Modification/update to aggregate processing plant.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
Fugitive PE	71.68

Emissions Unit ID: **F001**

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F001 - plant roadways and parking areas, paved and unpaved	OAC rule 3745-31-05(A)(3)	67.7 tons fugitive particulate matter (PE) per year from the unpaved and paved roadways and parking areas Visible particulate emissions shall not exceed 3 minutes in any 60 minute observation period on any unpaved roadway or parking area. Visible particulate emissions shall not exceed 1 minute in any 60 minute observation period on any paved roadway or parking area. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.c through A.2.i)
	OAC 3745-17-07(B)	None (See A.2.j)
	OAC 3745-17-08(B)	None (See A.2.k)

2. Additional Terms and Conditions

2.a The paved roadways and parking areas that are subject to the terms and conditions of this permit are listed below:

paved roadways:
0.6 mile paved road segment

paved parking areas:
office parking

2.b The unpaved roadways and parking areas that are subject to the terms and conditions of this permit are listed below:

unpaved roadways:
0.84 mile unpaved road segment

unpaved parking areas:
employee parking

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 using a self-propelled sweeper and water truck with a flusher unit, 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 all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water using a mobile water tank with spray bars, 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 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.f 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.g 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.h 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.i 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(A)(3).

2.j This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

2.k The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-08(B).

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:

paved roadways and parking areas	minimum inspection frequency
All	once per day of operation

unpaved roadways and parking areas	minimum inspection frequency
All	once per 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 emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

   a. <u>Emissions Limitation:</u>
   67.7 tons fugitive PE/yr
   (all roadways and parking areas)

Applicable Compliance Method:
The emission limitation was developed by applying a 95% control efficiency to uncontrolled emissions calculated by multiplying the AP-42 emission factors for paved and unpaved roadways [section 13.2.1.2 (12/03) and section 13.2.2.2 (12/03)], by the maximum vehicle miles traveled, and dividing by 2000 lbs/ton. These emissions factors and vehicle miles traveled are as follows:

Unpaved roadways:

Road Segment	Emissions Factor (lbs/VMT)	Vehicle miles traveled per year (VMT/yr)	Annual Controlled PE Emissions (tons PE/yr)
Segment 1	7.88	145,999	28.76
Segment 2	13.96	44,173	15.42
Segment 3	10.96	1,936	0.53

Paved roadways:

Road Segment	Emissions Factor (lbs/VMT)	Vehicle miles traveled per year (VMT/yr)	Annual Controlled PE Emissions (tons PE/yr)
Segment 4	0.03	8,848	0.01
Segment 5	5.07	181,324	22.98

Therefore, provided compliance is shown with the requirements of the permit to apply best available control measures, compliance with the annual limitation will be assumed.

b. Emissions Limitation:
Visible particulate emissions shall not exceed 3 minutes in any 60 minute observation period on any unpaved roadway or parking area.

Applicable Compliance Method:
If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 22.

c. Emissions Limitation:
Visible particulate emissions shall not exceed 1 minute in any 60 minute observation period on any paved roadway or parking area.

Applicable Compliance Method:
If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix

A, Method 22.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F003 - mineral extraction operations, including drilling, blasting and loading operations	OAC rule 3745-31-05(A)(3)	0.46 tons PE/yr Opacity restrictions (see A.2.b) Use of best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.c through A.2.d)
	OAC rule 3745-17-08(B)	None (see A.2.e)
	OAC rule 3745-17-07(B)	None (see A.2.f)

2. Additional Terms and Conditions

2.a The mineral extraction operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

Blasting, drilling, and limestone loading into trucks.

2.b Visible particulate emissions shall not exceed 20% opacity as a 3-minute average from the following mineral extraction operations: drilling and limestone loading into trucks.

2.c The permittee shall employ best available control measures for the above-identified mineral extraction operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the

permittee has committed to perform the following control measures to ensure compliance:

mineral extraction operation	control measure(s)
blasting	minimize area to be blasted, prevention of overshooting
drilling	emissions vented to baghouse
limestone loading into trucks	prevent haul vehicle overloading, spray shot rock with water as needed

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

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 rule 3745-31-05.

2.e The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

2.f This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

B. Operational Restrictions

1. This facility shall not exceed 347 blasts per year.

2. No "contract drilling" may occur at this facility without the permittee first certifying, in writing, to the Ohio EPA, Northwest District Office, that the contractor's drilling equipment employs best available control measures that comply with the requirements of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of drilling, blasting, and limestone loading operations at a minimum frequency of once per day.

2. The purpose of the inspections is to determine the need for implementing control measures for mineral extraction activities. The inspections shall be performed during representative, normal operating conditions.

3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:

   a. the date and reason any required inspection was not performed, 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 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.

   The information required 5.d. shall be kept separately for (i) the drilling operations, (ii) the blasting operations, and (iii) the loading operations, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall maintain the following monthly records for each blast:

   a. the date the blast occurred;

   b. the total number of blasting operations each month; and

   c. the annual year to date, number of blasts (sum of 5.b. for each calendar month to date from January to December)

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.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

2. The permittee shall submit annual deviation reports that identify exceedances of the annual number of blasts per year.

   If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. Emission Limitation:
   0.46 tons PE/yr

   Applicable Compliance Method:
   The permittee shall demonstrate compliance by applying the following emission factors to the associated maximum process weight rates:

Mineral Extraction Operation	Maximum Process Weight Rate	Emission Factor	Emission Factor Citation
Blasting operations	347 blasts/year	0.863 lb/blast	AP-42 Table 11.9-1, 7/98
Drilling operations	3,283,700 tons/year	0.00016 lbs/ton	AP-42 Table 11.19.2-2, 1/95
Loading operations	3,283,700 tons/year	0.000032 lbs/ton	AP-42 Table 11.19.2-2, 1/95

F. Miscellaneous Requirements

None.

Emissions Unit ID: **F004**

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	Applicable Rules/Requirements	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)
F004 - storage piles	OAC rule 3745-31-05(A)(3)	
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 3745-17-07(B)	
	OAC rule 3745-17-08(B)	
wind erosion from storage piles (see Section A.2.a. for identification of storage piles)	OAC rule 3745-31-05(A)(3)	

Applicable Emissions
Limitations/Control Measures

3.52 tons fugitive PE/yr

No visible fugitive particulate emissions except for a period of time not to exceed one minute during any 60-minute observation period

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.b, A.2.c, & A.2.f)

None (see A.2.g.)

None (see A.2.h)

No visible fugitive particulate emissions except for a period of time not to exceed one minute during any 60-minute observation period

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.d through A.2.f).

None (see A.2.g.)

None (see A.2.h)

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:

i. + 10 " rip rap storage pile
ii. - 10" x + 8" rip rap storage pile
iii. 8" x 4" rip rap stacker stockpile
iv. 8" x 4" rip rap reserve stockpile
v. #1/#2 radical stacker stockpile
vi. #1/#2 reserve storage pile
vii. #304 radical stacker stockpile
viii. #304 reserve storage stockpile
ix. #411 storage stockpile
x. #8 radical stacker stockpile
xi. #8 reserve storage stockpile
xii. #9 storage pile (truck dumped)
xiii. #57 radial stacker stockpile
xiv. #57 reserve storage stockpile
xv. #11 radial stacker stockpile
xvi. surge pile
xvii. #4 storage stockpile (north)
xviii. #4 storage stockpile (south)

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

2.c The above-mentioned control measure(s) shall be employed for 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 control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is necessary.

2.d The permittee shall employ best available control measures for wind erosion from the surfaces of 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 using chemical stabilization and spray water on an as-needed basis, and maintaining as low a pile height as possible. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The above-mentioned control measures shall be employed wind erosion from the surfaces of the storage piles, if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that additional control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of additional 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 requirements of OAC rule 3745-31-05(A)(3).

2.g This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

2.h The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emission unit is exempt from the requirements of OAC rule 3745-17-08(B).

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

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

storage pile identification	minimum load-in inspection frequency
all	once during each day of operation

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

storage pile identification	minimum load-out inspection frequency
all	once during each day of operation

3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from storage pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-in inspection frequency
all	once during each day of operation

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 control measures 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 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 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.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. Emission Limitation
   3.52 tons fugitive PE/yr

   Applicable Compliance Method
   The emission limitation was established by combining the emissions from each load-in and load-out operation and from wind erosion from each storage pile as listed in the permittee's application. The emission rates were determined as follows:

   i. Load-in - Emissions associated with load-in operations were established by multiplying a maximum load-in rate of 3,283,700 tons per year by the appropriate emission factor from AP-42 section 13.2.4 (1/95) [0.0045 lb PE/ton] applying a 90% control efficiency and dividing by 2000. (0.74 tons PE/yr)

   ii. Load-out - Emissions associated with load-out operations were established by multiplying the maximum load-out rate of 3,283,700 tons per year by the appropriate emission factor from AP-42 section 13.2.4 (1/95) [0.0045 lb PE/ton] applying a 90% control efficiency and dividing by 2000. (0.74 tons PE/yr)

   iii. Wind Erosion - Emissions associated with wind erosion were established by multiplying a maximum surface area of 32.135 acres by the appropriate emission factor from USEPA's control of Open Fugitive Dust Sources (September 1988) [3.47 lb PE/day/acre] by a maximum operating schedule of 365 days per year and dividing by 2000 and applying a 90% control efficiency. (2.04 tons PE/yr)

   Therefore, provided compliance is shown with the requirements of the permit to apply best available control measures, compliance with the annual limitation will be assumed.

a. Emission Limitation
No visible fugitive particulate emissions except for a period of time not to exceed one minute during any 60-minute observation period for load-in and load-out of storage piles

Applicable Compliance Method
If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 22.

b. Emission Limitation
No visible fugitive particulate emissions except for a period of time not to exceed one minute during any 60-minute observation period for wind erosion from storage piles

Applicable Compliance Method
If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 22.

F. Miscellaneous Requirements

None