State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
HENRY 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: 03-16054

DATE: 2/26/2004

Gerken Materials, Inc.
Jim Scheub
PO Box 607 9-051 US Route 24
Napoleon, OH 43545

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: 2/26/2004**
Terms and Conditions	**Effective Date: 2/26/2004**

FINAL PERMIT TO INSTALL 03-16054

Application Number:	03-16054
APS Premise Number:	0335940001
Permit Fee:	**$600**
Name of Facility:	Gerken Materials, Inc.
Person to Contact:	Jim Scheub
Address:	PO Box 607 9-051 US Route 24 Napoleon, OH 43545

Location of proposed air contaminant source(s) [emissions unit(s)]:
9-051 US Route 24
Napoleon, **Ohio**

Description of proposed emissions unit(s):
Portable shredder/grinder diesel engine with associated storage piles and roadways.

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
PE	5.26
VOC	1.96
NOx	24.60
SO2	1.61
CO	5.28

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 - unpaved roadways.	OAC rule 3745-31-05(A)(3)	1.11 tons fugitive particulate emissions (PE/yr) There shall be no visible fugitive particulate emissions from any unpaved roadway except for a period of time not to exceed three minutes 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 through A.2.g)
	OAC rule 3745-17-07 (B)	See A.2.h
	OAC rule 3745-17-08 (B)	See A.2.h

2. Additional Terms and Conditions

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

Unpaved Roadways
All Unpaved Roadways

2.b The permittee shall employ best available control measures on all unpaved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ good housekeeping practices and watering at sufficient treatment frequencies to ensure compliance. 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 this permit. Implementation of the control measures shall not be necessary for an unpaved roadway 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.d Any unpaved roadway, 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 using appropriate dust control measures 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 a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.

2.e 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.f 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.g 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.

2.h The unpaved roadways are associated with the portable shredder/grinder system (emissions unit P903) permitted under facility ID 0335940001. The emission limitation of

2.77 tons fugitive PE represent the maximum emissions which will be emitted from the unpaved roadways for any proposed site for relocation of the portable shredder/grinder system.

The roadways are associated with a portable source and are applicable to the requirements of OAC rule 3745-17-07(B) and 3745-17-08(B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08. The emission limitations and control requirements established by OAC rule 3745-17-07 (B) and OAC rule 3745-17-08(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

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 unpaved roadways in accordance with the following frequencies:

Unpaved Roadways	Minimum Inspection Frequency
All	Once During Each Day of Operation

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway 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 updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

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

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

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

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

E. Testing Requirements

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

   a. Emission Limitation: 1.11 tons fugitive PE/yr for unpaved roadways

      Applicable Compliance Method: This emission limitation was developed by applying a 95% control efficiency for use of best available control measures to a maximum potential uncontrolled emission rate of 11.10 tons per year fugitive PE. The maximum potential uncontrolled emission rate was calculated using AP-42 emission factors from Chapter 13.2.2 (9/98) (11.10 lbs PE/VMT) and a maximum 2009 vehicle miles traveled.

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

   b. Emission Limitation: There shall be no visible particulate emissions from any unpaved roadway except for a period of time not to exceed three minutes during any 60-minute observation period.

      Applicable Compliance Method: If required, compliance with the visible emission limitation specified 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.

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
F002 - 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
OAC rule 3745-17-07 (B)	0.49 tons fugitive Particulate Emissions (PE)/yr
OAC rule 3745-17-07 (B)	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, and A.2.f)
	See A.2.g
	See A.2.g
	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)
	See A.2.g
	See A.2.g

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:

Main Product Storage Pile

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 measures 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.

2.d The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to watering the piles as needed and maintenance of a low pile height to ensure compliance. 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 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

2.f Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

2.g The storage piles are associated with the portable shredder/grinder system (emissions unit P903) permitted under facility ID 0335940001. The emission limitation of 0.49 ton fugitive PE per year represents the maximum emissions which will be emitted from the storage piles associated with the portable shredder/grinder system.

The storage piles are associated with a portable source and are applicable to the requirements of OAC rule 3745-17-07(B) and 3745-17-08(B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08. The emission limitations and control requirements established by OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

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

Storage Pile Identification	Minimum Load-In Inspection Frequency
Main Product Storage Pile	Once During Each Day of Operation

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

Storage Pile identification	Minimum Load-Out Inspection Frequency
Main Product Storage Pile	Once During Each Day of Operation

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

Storage Pile Identification	Minimum Wind Erosion Inspection Frequency
Main Product Storage Pile	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 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 may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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

   a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

   b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

   c. the dates the control measures were implemented; and

   d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

   The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

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

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow

and/or ice cover or precipitation; and

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

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

E. Testing Requirements

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

a. Emission Limitation: 0.49 ton fugitive PE/yr

Applicable Compliance Method: The emission limitation was established by combining the emissions from load-in and load out operations and from wind erosion from each storage pile as listed in the permittee's application and applying a 95% control efficiency for use of best available control measures. Load-in and load-out operation emissions are based on a maximum load-in and load-out rate of 660,000 tons per year of product. Wind erosion emissions are based on a maximum storage pile surface area of 0.25 acre as listed in the permit application:

The emission rate was determined as follows:

i. Load-in- emissions associated with load-in operations were established by multiplying the maximum load-in rate of 660,000 tons of product per year by the appropriate emission factor from AP-42 section 13.2.4 (1/95) [0.014 lb PE/ton product], applying a 95% control efficiency and dividing by 2000 lbs/ton. (0.23 tons fugitive PE/yr)

ii. Load-out- emissions associated with load-out operations were established by multiplying the maximum load-out rate of 660,000 tons of product per year by the appropriate emission factor from AP-42 section 13.2.4 (1/95) [0.014 lb PE/ton product], applying a 95% control efficiency and dividing by 2000 lbs/ton. (0.23 tons fugitive PE/yr)

iii. Wind erosion- emissions were established by multiplying a maximum storage pile surface area of 0.25 acre, the appropriate emission factor from USEPA's Control of Open Fugitive Dust Sources (9/88) [13.89 lbs PE/day/acre of product], a maximum operating schedule of 365 days per year and dividing by 2000 and

applying a 95% control efficiency. (0.03 ton PE/yr)

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

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 from load-in and load-out of the storage piles

Applicable Compliance Method: If required, compliance with the visible emission limitations for the storage pile 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.

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

Applicable Compliance Method: If required, compliance with the visible emission 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"), 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.

F. Miscellaneous Requirements

None.

Emissions Unit ID: **P903**

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
P903 - Portable shredder/grinder system (w/diesel engine) and associated material handling operations.	2.53 mmBtu/hr diesel fired engine used to power portable shredder/grinder system and associated material handling operations	OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07 (B)	Applicable Emissions Limitations/Control Measures	11.16 lbs nitrogen oxides (NOx)/hr & 24.60 tons NOx/yr
OAC rule 3745-17-08 (B)	0.27 tons fugitive particulate emissions (PE)/yr	2.40 lbs carbon monoxide (CO)/hr & 5.28 tons CO/yr
OAC rule 3745-31-05 (A) (3)	Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average for front-end loader dumping into shredder/grinder.	0.73 sulfur dioxides (SOx)/hr & 1.61 tons SOx/yr 0.89 lbs volatile organic compounds (VOC)/hr & 1.96 tons VOC/yr
	There shall be no visible particulate emissions from the shredder/grinder and for the transfer point from the shredder/grinder to the conveyor when processing materials other than non-metallic mineral products.	Visible particulate emissions shall not exceed 10% opacity as a 6-minute average, except during start-up and shutdown See A.2.f
	Visible fugitive PE shall not exceed 15% opacity, as a 6-minute, from the shredder/grinder and for the transfer point from the shredder/grinder to the conveyor when processing non-metallic mineral products.	See A.2.g 0.310 lb PE/mmBtu of actual heat input See A.2.h See A.2.i
OAC rule 3745-17-07 (A) OAC rule 3745-17-11 (B) (5) (a) OAC rule 3745-18-06 (G)	Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.a. through A.2.d.)	See A.2.i See A.2.i
OAC rule 3745-21-08(B)	See A.2.e	
OAC rule 3745-23-06(B)	See A.2.e	
OAC rule 3745-21-07(B)	1.73 tons PE/yr	

2. Additional Terms and Conditions

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

Front-end loader dumping into shredder/grinder
Shredding/grinding
Shredder/grinder to conveyor transfer point

2.b The permittee shall employ best available control measures for the above-identified material handling operations 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 watering as needed via water spray at the shredder/grinder and to minimize the free fall distance from the front-end loader.

2.c For each material handling operation that is not adequately enclosed, the above-identified control measures 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measures is unnecessary.

2.d 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).

2.e This emissions unit is a portable source and is applicable to the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B) when located in an "Appendix A" area as identified in OAC rule 3745-17-08. The emission limitations and control requirements established by OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B) are equivalent to or less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

When the emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08, this emission unit is exempt from the requirements of OAC rule 3745-17-08(B) pursuant to OAC rule 3745-17-08(A) and is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B)(1) pursuant to OAC rule 3745-17-07(B)(11)(e).

2.f The requirements of this rule also include compliance with OAC rule 3745-17-11(B)(5)(a).

2.g 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.h This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).

2.i The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and OAC rule 3745-21-07(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

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 the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision 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.

B. Operational Restrictions

1. The permittee shall combust only distillate fuel oil in this emissions unit.

   The oil combusted in this emissions unit shall only be distillate oil (fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils"). The sulfur content of the distillate oil shall contain no more than 0.5 weight percent sulfur.

2. The maximum annual operating hours for this emissions unit shall not exceed 4400.

C. Monitoring and/or Recordkeeping Requirements

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

Material Handling Operations	Minimum Inspection Frequency
All	Once During Each Day of Operation

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

3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office 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;

   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.

   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.

5. The permittee shall use records of fuel supplier certification to demonstrate compliance with the operational restriction in section B.1. Records of fuel supplier certification shall include the following information:

   i. the name of the oil supplier; and

   ii. a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in B.1 above.

6. The permittee shall collect and record the following information each month:

   a. the total hours of operations;

b. the annual, year to date, hours of operation (sum of "a") 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 deviation (excursion) reports that identify each day when a fuel other than distillate oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual hours of operation restriction. If no deviations occurred during the calendar year, the permittee shall submit an annual report which sates that no deviations occurred during the calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. <u>Emission Limitation:</u>
   Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average for front-end loader dumping into shredder/grinder.

   <u>Applicable Compliance Method:</u>
   If required, compliance shall be demonstrated using 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, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

b. Emission Limitation:
Visible fugitive PE shall not exceed 15% opacity, as a 6-minute, from the shredder/grinder and for the transfer point from the shredder/grinder to the conveyor when processing non-metallic mineral products.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:
There shall be no visible particulate emissions from the shredder/grinder and for the transfer point from the shredder/grinder to the conveyor when processing materials other than non-metallic mineral products.

Applicable Compliance Method:
If required, compliance shall be demonstrated using Method 22 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:
0.27 ton fugitive PE/yr

Applicable Compliance Method:
The emission limitation is based on a maximum throughput rate of 150 tons per hour, a maximum operating schedule of 4400 hrs/yr, and the following emission factors from AP-42, Section 11.19.2 (1/95):

Shredding/grinding - 0.0007 lb PE/ton
Shredder/grinder to conveyor transfer point - 0.000021 lb PE/ton
Front-end loader dumping into shredder/grinder - 0.0001 lb PE/ton

Therefore provided compliance is shown with the annual maximum operating restriction of 4400 hrs/yr and the requirement to apply best available control measures, compliance with the annual limitation will be assumed.

h. Emission Limitation:
0.310 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee shall demonstrate compliance by using an AP-42 emission factor of 0.31 lb PM_{10}/mmBtu (Section 3.3 - 10/96) (assume all PE is PM_{10}). If required, compliance shall be demonstrated by testing using Methods 1-4 and 5 (including the front and back-half of the sampling train) of 40 CFR, Part 60, Appendix A.

i. Emission Limitation:
1.73 tons PE/yr (engine stack)

Applicable Compliance Method:
This emission limitation is based the emission limitation of 0.310 lb/mmBtu, a maximum heat input rate of 2.53 mmBtu/hr and a maximum operating schedule of 4400 hrs/yr and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the annual maximum operating restriction of 4400 hrs/yr, compliance with the annual limitation will be assumed.

j. Emission Limitation: Visible PE shall not exceed 10% opacity as a 6-minute average, except during start-up and shutdown.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

k. Emission Limitation:
11.16 lbs NOx/hr, 24.60 tons NOx/yr

Applicable Compliance Method:
The hourly emission limitation is based on the emission unit's potential-to-emit*. Therefore, no hourly recordkeeping, deviation reporting or compliance method

calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

*The potential-to-emit is based on a maximum heat input rate of 2.53 mmBtu/hr multiplied by the AP-42 emission factor 4.41 lbs/mmBtu (Section 3.3-10/96).

The tons/yr emission limitation was developed by multiplying the lb/hr emission limitation by a maximum operating schedule of 4400 hrs/yr divided by 2000 lbs/ton. Therefore, provided compliance is shown with the annual maximum operating restriction of 4400 hrs/yr, compliance with the annual limitation will be assumed.

l. Emission Limitation:
2.40 lbs CO/hr, 5.28 tons CO/yr

Applicable Compliance Method:
The hourly emission limitation is based on the emission unit's potential-to-emit*. Therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

*The potential-to-emit is based on a maximum heat input rate of 2.53 mmBtu/hr multiplied by the AP-42 emission factor of 0.95 lb CO/mmBtu (Section 3.3-10/96).

The tons/yr emission limitation was developed by multiplying the lb/hr emission limitation by a maximum operating schedule of 4400 hrs/yr divided by 2000 lbs/ton. Therefore, provided compliance is shown with the annual maximum operating restriction of 4400 hrs/yr, compliance with the annual limitation will be assumed.

m. Emission Limitation:
0.73 lb SO2/hr, 1.61 tons SO2/yr

Applicable Compliance Method:
The hourly emission limitation is based on the emission unit's potential-to-emit*. Therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

*The potential-to-emit is based on a maximum heat input rate of 2.53 mmBtu/hr multiplied by the AP-42 emission factor of 0.29 lb SO2/mmBtu (Section 3.3-10/96).

The tons/yr emission limitation was developed by multiplying the lb/hr emission limitation by a maximum operating schedule of 4400 hrs/yr divided by 2000 lbs/ton. Therefore, provided compliance is shown with the annual maximum operating restriction of 4400 hrs/yr, compliance with the annual limitation will be assumed.

n. Emission Limitation:
0.89 lbs VOC/hr, 1.96 tons VOC/yr

Applicable Compliance Method:
The hourly emission limitation is based on the emission unit's potential-to-emit*. Therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A as applicable of 40 CFR, Part 60, Appendix A.

*The potential-to-emit is based on a maximum heat input rate of 2.53 mmBtu/hr multiplied by the AP-42 emission factor of 0.35 lb VOC/mmBtu (Section 3.3-10/96).

The tons/yr emission limitation was developed by multiplying the lb/hr emission limitation by a maximum operating schedule of 4400 hrs/yr divided by 2000 lbs/ton. Therefore, provided compliance is shown with the annual maximum operating restriction of 4400 hrs/yr, compliance with the annual limitation will be assumed.

F. Miscellaneous Requirements

1. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:

   a. the portable emissions unit is equipped with the best available control technology for such portable emissions unit;

   b. the portable emissions unit is operating pursuant to a currently effective permit to install, permit to operate or registration;

   c. the applicant has provided proper notice of intent to relocate the portable emissions unit to the Northwest District Office (NWDO) and the appropriate field office having jurisdiction

over the new site within a minimum of thirty days prior to the scheduled relocation; and,

d. in the NWDO's and the appropriate field office's judgement, the proposed site is acceptable under the rule 3745-15-07 of the Administrative Code.

2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:

   a. the portable emissions unit permittee possesses an Ohio EPA PTI, PTO or registration status;

   b. the portable emissions unit is equipped with best available technology;

   c. the portable emission unit owner has identified the proposed site to Ohio EPA;

   d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;

   e. a public notice, consistent with Chapter 3745-47 of the Administrative Code, is published in the county where the proposed site is located;

   f. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to the proposed site; and,

   g. the portable emissions unit owner has provided the Ohio EPA with fifteen days written notice of the relocation.

   Any site approvals issued by the Ohio EPA, pursuant to section F.2. above, shall be valid for no longer than three years and are subject to renewal.

3. In order for the NWDO and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with the NWDO (347 North Dunbridge Road, Bowling Green, OH 43402) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the NWDO and/or the appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

4. The permittee should be advised that when portable emission units are located at a stationary

source or at a source comprised of portable emission units, potential emissions from the portable emission units are included in the facility potential to emit calculations for Title V applicability.

The permittee shall include a potential to emit analysis of facility-wide emissions (including the portable sources) for the proposed relocation in the "Notice of Intent to Relocate".

The permittee should be advised that the annual restriction of 4400 hours of operation was established to keep NOx emissions below the state modeling significant emission rate and is not considered federally enforceable. The federally enforceable potential to emit for this emissions unit is based on a maximum operating schedule of 8760 hours per year.