



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

11/15/2012

Certified Mail

Mr. Robert Boehk
Erie Materials Inc.
PO BOX 2308
Sandusky, OH 44870

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| Yes | MACT/GACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MODELING SUBMITTED |
| Yes | SYNTHETIC MINOR TO AVOID TITLE V |
| Yes | FEDERALLY ENFORCABLE PTIO (FEPTIO) |
| | SYNTHETIC MINOR TO AVOID MAJOR GHG |

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0322020211
Permit Number: P0110030
Permit Type: Initial Installation
County: Erie

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Sandusky Register. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NWDO; Michigan; Canada

PUBLIC NOTICE

11/15/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Erie Materials Inc.
4507 Tiffin Avenue,
Sandusky, OH 44870
Erie County

FACILITY DESC.: Asphalt Paving Mixture and Block Manufacturing

PERMIT #: P0110030

PERMIT TYPE: Initial Installation

PERMIT DESC: 345 hp diesel-fired water pump motor and 375 hp diesel-fired wash plant motor that were both installed and operated in 1999.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: 2 Diesel-fired motors: 345 hp water pump motor (P005) and 375 hp wash plant motor (P007)
3. Facility Emissions and Attainment Status: The facility-wide emissions that includes emissions units aggregate processing plant (F001), storage piles (F002), roadways and parking areas (F003), mineral extraction operations (F004), RAP sizing plant (F005), liquid asphalt loading rack (J001), generator for secondary plant (P001), generator for primary plant (P002), liquid asphalt heater (P004), dewatering pump (P005), aggregate plant dewatering plant (P006), wash plant pump (P007), RTRS plant (P901), storage tanks (T001-T007) and 2 used waste oil heaters (W001 and W002) amounts to 70.72 tons per year of particulate emissions, 21.73 tons per year of sulfur dioxide, 92.99 tons per year of nitrogen oxides, 18.49 tons per year of carbon monoxide and 3.89 tons per year of organic compounds. Currently, Erie County is in attainment status for all criteria pollutants.
4. Source Emissions: The facility is requesting federally enforceable emission limitations based on 2,750 hours per year of operating these two motors. The hourly limitation is a combined limit for both motors.
5. Conclusion: The facility was requested to submit an updated potential to emit summary that includes all of the emission units operating at this site. Currently, the facility is a synthetic minor based on the information that has been submitted.
6. Please provide additional notes or comments as necessary:
- None
7. Total Permit Allowable Emissions Summary (for informational purposes only):

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|---------------------|----------------------|
| PE/PM ₁₀ | 1.13 |
| CO | 3.45 |
| NO _x | 15.98 |
| OC | 1.29 |



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Erie Materials Inc.**

| | |
|----------------|-----------------------------------|
| Facility ID: | 0322020211 |
| Permit Number: | P0110030 |
| Permit Type: | Initial Installation |
| Issued: | 11/15/2012 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |



Division of Air Pollution Control
Permit-to-Install and Operate
for
Erie Materials Inc.

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Authorization

Facility ID: 0322020211
Application Number(s): A0041808
Permit Number: P0110030
Permit Description: 345 hp diesel-fired water pump motor and 375 hp diesel-fired wash plant motor that were both installed and operated in 1999.
Permit Type: Initial Installation
Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/15/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Erie Materials Inc.
4507 Tiffin Avenue
Sandusky, OH 44870

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0110030

Permit Description: 345 hp diesel-fired water pump motor and 375 hp diesel-fired wash plant motor that were both installed and operated in 1999.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Diesel-fired motors

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | P005 |
| Company Equipment ID: | P005 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P007 |
| Company Equipment ID: | P007 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



Draft Permit-to-Install and Operate

Erie Materials Inc.

Permit Number: P0110030

Facility ID: 0322020211

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate

Erie Materials Inc.

Permit Number: P0110030

Facility ID: 0322020211

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements is not delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District Office of Local Air Agency.



Draft Permit-to-Install and Operate

Erie Materials Inc.

Permit Number: P0110030

Facility ID: 0322020211

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Diesel-fired motors: P005 and P007

| EU ID | Operations, Property and/or Equipment Description |
|--------------|--|
| P005 | 345 hp diesel-fired water pump motor |
| P007 | 375 hp diesel-fired wash plant motor |

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)b., c)(2), d)(3), e)(1) and f)(1)f. - f)(1)j.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| a. | OAC rule 3745-31-05(A)(3) | See b)(2)a. |
| b. | OAC rule 3745-31-05(D) | <u>Emissions from emissions unit P005:</u> 10.70 lbs/hr of nitrogen oxide (NO _x) 0.76 lb/hr of particulate emissions less than 10 microns in diameter (PM ₁₀) 0.71 lb/hr of sulfur dioxide (SO ₂) 0.86 lb/hr of volatile organic compound (VOC) 2.30 lbs/hr of carbon monoxide (CO) <u>Emissions from emissions unit P007:</u> 11.62 lbs/hr of NO _x 0.82 lb/hr of PM ₁₀ |



Draft Permit-to-Install and Operate

Erie Materials Inc.

Permit Number: P0110030

Facility ID: 0322020211

Effective Date: To be entered upon final issuance

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| | | <p>0.77 lb/hr of SO₂</p> <p>0.94 lb/hr of VOC</p> <p>2.51 lbs/hr CO</p> <p>Visible PE from the stack serving each engine shall not exceed 10% opacity, as a six-minute average, except during acceleration.</p> <p><u>Combined emissions from P005 and P007:</u></p> <p>15.98 tons of NO_x per year as a rolling, 12-month summation of the monthly emissions.</p> <p>1.13 tons of PM₁₀ per year as a rolling, 12-month summation of the monthly emissions.</p> <p>1.06 tons of SO₂ per year as a rolling, 12-month summation of the monthly emissions.</p> <p>1.29 tons of VOC per year as a rolling, 12-month summation of the monthly emissions.</p> <p>3.45 tons of CO per year as a rolling, 12-month summation of the monthly emissions.</p> <p>See b)(2)b. and c)(2).</p> |
| c. | OAC rule 3745-17-07(A)(1) | See b)(2)c. |
| d. | OAC rule 3745-17-11(B)(5)(a) | PE shall not exceed 0.310 pound per mmBtu of actual heat input. |
| e. | OAC rule 3745-18-06(B) | See b)(2)d. |
| f. | 40 CFR Part 60, Subpart IIII | See b)(2)e. |
| g. | OAC rule 3745-110-03(J)(3) | See b)(2)f. |



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements for this emission units have been determined to be compliance with OAC rule 3745-31-05(D) and OAC rule 3745-17-11(B)(5)(a) and compliance with the terms and conditions of this permit.
- b. This permit establishes federally enforceable emission limitations in b)(1)b. for purposes of avoiding applicability of Title V requirements. The federally enforceable emission limitations are based on the operational restriction contained in c)(2).
- c. The opacity limitation specified in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
- d. The engines are exempt from OAC rule 3745-18-06(G) per OAC rule 3745-18-06(B).
- e. This stationary compression ignition (CI) internal combustion engine (ICE) was manufactured before April 1, 2006. In accordance with 40 CFR §60.4200(a), this emissions unit is not subject to 40 CFR Part 60, Subpart IIII.
- f. The engines are exempt from OAC rule 3745-110-03 per OAC rule 3745-110-03(J)(3).
- g. The hourly emission limitations specified above are based upon the emissions units' potential to emit. Therefore, no hourly records are required to be maintained to demonstrate compliance with these limitations.

c) Operational Restrictions

- (1) The permittee shall use only diesel fuel/number 2 fuel oil with a maximum sulfur content of 0.5 percent, by weight, for combustion in these engines.
- (2) The maximum annual hours of operation for emissions units P005 and P007, combined, shall not exceed 2,750 hours per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation under the provision of this permit, the permittee shall not exceed the operating hours specified in the following table:

| Month(s) | Maximum Allowable Cumulative Hours of Operation (for P005 and P007 combined) |
|-----------------|---|
| 1 | 500 |
| 1-2 | 1,000 |
| 1-3 | 1,500 |
| 1-12 | 2,750 |



After the first 12-months of operation under the provisions of this permit, compliance with the annual hours of operation restriction shall be based upon a rolling, 12-month summation of operating hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in these engines.
- (2) The permittee shall use records of fuel supplier certification (product transfer document) to demonstrate compliance with the operational restriction in c)(1). Records of fuel supplier certification (product transfer document) shall include the following information:
 - a. the name of the oil supplier; and
 - b. a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in c)(1) above.
- (3) The permittee shall maintain monthly records of the following information for both emissions units combined:
 - a. the number of hours of operation for each month;
 - b. during the first 12 calendar months of operation or the first 12 calendar months, under the provision of this permit, the permittee shall record the cumulative number of hours of operation for each calendar month; and
 - c. beginning after the first 12 calendar months of operation or the first 12 calendar months, under the provision of this permit, the rolling, 12-month summation of the number of hours of operation.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month restriction on the number of hours of operation; and
 - ii. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative number of hours of operation.



- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

NO_x emissions shall not exceed 10.70lbs/hr(from emissions unit P005) and 11.62 lbs/hr (from emissions unit P007).

Applicable Compliance Method:

Compliance with the hourly limitation shall be based upon the use of an emission factor (0.031lbNO_x/hp-hr) specified in the U.S. EPA reference document AP-42, Compilation of Air Pollutant Emission Factors, Section 3.3, Table 3.3-1 (10/1996) multiplied by the respective rated capacities of P005 (345 hp) and P007 (375 hp).

If required, compliance with the hourly NO_x emission limitations shall be determined in accordance with Test Methods 1 – 4 and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

b. Emissions Limitations:

PM₁₀ emissions shall not exceed 0.76 lb/hr (from emissions unit P005) and 0.82 lb/hr (from emissions unit P007).



Applicable Compliance Method:

Compliance with the hourly limitation shall be based upon the use of an emission factor (0.0022lbPM₁₀/hp-hr) specified in the U.S. EPA reference document AP-42, Compilation of Air Pollutant Emission Factors, Section 3.3, Table 3.3-1 (10/1996) multiplied by the respective rated capacities of P005 (345 hp) and P007 (375 hp).

If required, compliance with the hourly particulate emissions shall be determined in accordance with Test Methods 1 – 4 and 201 or 201A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

c. Emissions Limitations:

SO₂ emissions shall not exceed 0.71lb/hr(from emissions unit P005) and 0.77lb/hr (from emissions unit P007).

Applicable Compliance Method:

Compliance with the hourly limitation shall be based upon the use of an emission factor (0.00205 lb SO₂/hp-hr) specified in the U.S. EPA reference document AP-42, Compilation of Air Pollutant Emission Factors, Section 3.3, Table 3.3-1 (10/1996) multiplied by the respective rated capacities of P005 (345 hp) and P007 (375 hp).

If required, compliance with the hourly SO₂ emission limitations shall be determined in accordance with Test Methods 1 - 4 and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

d. Emissions Limitations:

VOC emissions shall not exceed 0.86lb/hr (from emissions unit P005) and 0.94 lb/hr (from emissions unit P007).

Applicable Compliance Method:

Compliance with the hourly limitation shall be based upon the use of an emission factor (0.0025lbVOC/hp-hr) specified in the U.S. EPA reference document AP-42, Compilation of Air Pollutant Emission Factors, Section 3.3, Table 3.3-1 (10/1996) multiplied by the respective rated capacities of P005 (345 hp) and P007 (375 hp).

If required, compliance with the hourly VOC emission limitations shall be determined in accordance with Test Methods 1 - 4, 18 and 25 or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test



methods may be used with prior approval from Ohio EPA, Northwest District Office.

e. Emissions Limitations:

CO emissions shall not exceed 2.30 lbs/hr(from emissions unit P005) and 2.51 lbs/hr(from emissions unit P007).

Applicable Compliance Method:

Compliance with the hourly limitation shall be based upon the use of an emission factor (0.00668 lb CO/hp-hr) specified in the U.S. EPA reference document AP-42, Compilation of Air Pollutant Emission Factors, Section 3.3, Table 3.3-1 (10/1996) multiplied by the respective rated capacities of P005 (345 hp) and P007 (375 hp).

If required, compliance with the hourly CO emissions shall be determined in accordance with Test Methods 1 - 4 and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

f. Emissions Limitation:

The combined NO_x emissions from P005 and P007 shall not exceed 15.98 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation above was developed by multiplying the hourly emissions rate of emissions unit P007 (11.62 lbsNO_x/hr) by a maximum annual operating schedule of 2,750 hours, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation and the rolling, 12-month hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.

g. Emissions Limitation:

The combined PM₁₀ emissions from P005 and P007 shall not exceed 1.13 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation above was developed by multiplying the hourly emissions rate of emissions unit P007 (0.82 lbPM₁₀/hr) by a maximum annual operating schedule of 2,750 hours, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation and the rolling, 12-month hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.



h. Emissions Limitation:

The combined SO₂ emissions from P005 and P007 shall not exceed 1.06 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation above was developed by multiplying the hourly emissions rate of emissions unit P007 (0.77 lbSO₂/hr) by a maximum annual operating schedule of 2,750 hours, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation and the rolling, 12-month hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.

i. Emissions Limitation:

The combined VOC emissions from P005 and P007 shall not exceed 1.29 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation above was developed by multiplying the hourly emissions rate of emissions unit P007 (0.94 lb VOC/hr) by a maximum annual operating schedule of 2,750 hours, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation and the rolling, 12-month hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.

j. Emissions Limitation:

The combined CO emissions from P005 and P007 shall not exceed 3.45 tons per year as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation above was developed by multiplying the hourly emissions rate of emissions unit P007 (2.51 lbs CO/hr) by a maximum annual operating schedule of 2,750 hours and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation and the rolling, 12-month hours of operation restriction, compliance with the annual emission limitation shall also be demonstrated.

k. Emissions Limitation:

PE shall not exceed 0.310 pound/million Btu actual heat input.

Applicable Compliance Method:

If required, compliance with the particulate emissions limitation shall be determined in accordance with Test Methods 1 - 5, as set forth in the "Appendix



Draft Permit-to-Install and Operate

Erie Materials Inc.

Permit Number: P0110030

Facility ID: 0322020211

Effective Date: To be entered upon final issuance

on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Northwest District Office.

I. Emissions Limitation:

Visible PE from any stack serving each engine shall not exceed 10% opacity, as a six minute average, except during acceleration.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.