



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
RICHLAND COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

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

Application No: 03-17249

Fac ID: 0370950002

DATE: 3/13/2007

Heckett MultiServ Plant 36
Glenn Hundertmark
1490 Old Bowman Street
Mansfield, OH 44903

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

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

CC: USEPA

NWDO



Permit To Install
Terms and Conditions

Issue Date: 3/13/2007
Effective Date: 3/13/2007

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-17249

Application Number: 03-17249
Facility ID: 0370950002
Permit Fee: **\$375**
Name of Facility: Heckett MultiServ Plant 36
Person to Contact: Glenn Hundertmark
Address: 1490 Old Bowman Street
Mansfield, OH 44903

Location of proposed air contaminant source(s) [emissions unit(s)]:
1490 Old Bowman Street
Mansfield, Ohio

Description of proposed emissions unit(s):
Scalping operation including 80 hp diesel generator, grizzly feeder, screen and conveyors.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
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 (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

Heckett MultiServ Plant 36
PTI Application: 03-17249
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Facility ID: 037095000

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

<u>Pollutant</u>	<u>Tons Per Year</u>
No annual allowable emissions established	

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 - (P901) - Scalping operation including 80 hp diesel generator, grizzly feeder, screen and conveyors

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Scalping Operation	
OAC rule 3745-31-05(C)	See A.2.a and A.2.b
OAC rule 3745-17-07(B)	Visible particulate emissions (PE) from any fugitive dust source shall not exceed 20% opacity as a 3-minute average, except as provided by rule.
OAC rule 3745-17-08(B)(1)	The permittee shall utilize reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See sections A.2. c and A.2. d)
80 hp Diesel Generator	
OAC rule 3745-31-05(C)	See A.2. b and A.2.e
ORC 3704.03(T)(4)	See A.2. e
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B)(5)	0.310 pound of particulate emissions per million Btu of actual heat input
OAC rule 3745-21-07(B)	See A.2. f
OAC rule 3745-21-08(B)	See A.2. f
OAC rule 3745-23-06(B)	See A.2. g

Modification Issued: 3/13/2007**2. Additional Terms and Conditions**

2.a Permit to Install 03-17249 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for purposes of establishing requirements that would be equivalent to Best Available Technology (BAT) requirements under OAC rule-3745-31-05(A)(3):

- i. watering at appropriate locations in the scalping operations.

The voluntary restrictions above are being defined as equivalent to BAT requirements such that this emissions unit meets the criteria in F.1.a associated with the relocation of a portable source. BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the fugitive particulate emissions (PE) and fugitive particulate matter 10 microns or less in size (PM10) emissions from this air contaminant source since the calculated annual emission rate for PE and PM10 is less than ten tons per year taking into account the permittee's request for voluntary restrictions equivalent to BAT requirements.

2.b 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. Voluntary restrictions proposed by the permittee under OAC rule 3745-31-05(C) are more stringent than any requirements/emissions limitations as may be applicable under OAC 3745-17-07(B) and OAC 3745-17-08(B).

2.c The permittee shall employ reasonably available control measures for the scalping operation for the purposes of ensuring compliance with the above mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the scalping operation at appropriate locations with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.d For each part of the scalping 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

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the scalping operation until further observation confirms that use of the control measures is unnecessary.

- 2.e** Permit to Install 03-17249 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for purposes of establishing requirements that would be equivalent to Best Available Technology (BAT) requirements under OAC rule-3745-31-05(A)(3):
- i. combustion of only distillate fuel oil in this emissions unit; and
 - ii. compliance with the hours of operation restriction specified in B.1.

The voluntary restrictions above are being defined as equivalent to BAT requirements such that this emissions unit meets the criteria in F.1.a associated with the relocation of a portable source. BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x emissions from this air contaminant source since the calculated annual emission rate for NO_x is less than ten tons per year taking into account the permittee's request for voluntary restrictions equivalent to BAT requirements.

BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to CO, SO₂, VOC, PE, and PM₁₀ from the diesel generator since the uncontrolled potential to emit is less than ten tons per year for each pollutant.

- 2.f** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to 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 minimizing emissions in accordance with best current technology.

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.

- 2.g** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by minimizing

Emissions Unit ID: **P901**

emissions in accordance with best current technology.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; 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 U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. Operational Restrictions

1. The maximum annual hours of operation for the 80 hp diesel generator shall not exceed 2080.

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2. 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.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the hours of operation of the diesel generator (in hours per month and total hours, to date for the calendar year).
2. For each day during which the permittee burns a fuel other than distillate fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall use records of fuel supplier certification to demonstrate compliance with the operational restriction in section B.2. Records of fuel supplier certification 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 B.2 above.
4. Except as otherwise provided in this section, for each part of the scalping operation that is not adequately enclosed, the permittee shall perform inspections of such parts of the scalping operation in accordance with the following minimum frequencies:

Scalping Operation	Minimum Inspection Frequency
All	Once During Each Day of Operation

5. The above-mentioned inspections shall be performed during representative, normal operating conditions.
6. 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 (d) shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit reports that summarize the total annual hour of operation for the diesel generator. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit deviation reports, in accordance with the reporting requirements under the General Terms and Conditions of this permit, that identify 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.
 - c. all exceedances of the sulfur content fuel restriction specified in condition B.2.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of the terms and condition of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Visible PE from any fugitive dust source shall not exceed 20% opacity as a 3-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(3).

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- b. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, compliance with the visible emissions limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- c. Emission Limitation: 0.310 pound of particulate emissions per million Btu of actual heat input

Applicable Compliance Method: Compliance may be demonstrated by the use of the AP-42 emission factor in Section 3.3 (10/96). If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A.

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 source was issued a PTI that defined BAT requirements and the portable source continues to comply with those BAT requirements; and
 - b. The portable source is currently in compliance with the currently effective PTI and the Permit to Operate (PTO); and
 - c. The applicant has provided proper notice of intent to relocate the portable source to the director within a minimum of thirty days prior to the scheduled relocation; and
 - d. The director has issued a notice stating that in the director's judgment, the proposed site is acceptable under rule 3745-15-07 of the Administrative Code, and
 - e. The director has issued a notice stating that in the director's judgment, relocating the portable source will not result in the installation of a major stationary source, the modification of a major stationary source or the creation of a Title V source.

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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 if the director has issued a site approval for the new location

In determining whether the director issues a site approval for a portable source, the applicant must demonstrate that the following criteria have been met pursuant to OAC rule 3745-31-05(E):

- a. The portable source is currently in compliance with the currently effective PTI and PTO.
- b. The portable source was issued a PTI that defined BAT requirements and the portable source continues to comply with those BAT requirements.
- c. The portable source owner has identified the proposed site to Ohio EPA.
- d. Ohio EPA has determined that the portable source, 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 source owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable source to this proposed site.
- g. The portable source owner has provided Ohio EPA with fifteen days written notice of the relocation.

Any site approvals issued by Ohio EPA shall be valid for no longer than three years and are subject to renewal.