

Synthetic Minor Determination and/or Netting Determination

Permit To Install 06-07226

A. Source Description

P001 is a portable 750 HP diesel-fired generator that is used to provide power for portable asphalt plant operations during asphalt production hours. P002 is a portable 80 HP diesel-fired generator that is used to provide power for portable asphalt plant operations during non-asphalt production hours.

B. Facility Emissions and Attainment Status

Mar-Zane Plant 12 is a portable drum mix asphalt plant that is permitted out of Muskingum County, which is currently in attainment for all criteria pollutants. When this portable facility is located at a stationary source or at a source comprised of other portable emission units, the permittee will be required to include the potential emissions from the portable emission units in the facility potential to emit calculations for Title V and PSD applicability. Not including the emissions units contained within this PTI application, the facility-wide potential to emit of permitted sources at Mar-Zane Plant 12 is 14.4 TPY NO_x, 33.93 TPY CO, 15.1 TPY SO₂, 21.6 TPY PE, and 11.55 TPY VOC.

C. Source Emissions

The facility has requested federally enforceable limitations to limit the potential to emit of P001 and P002. The facility is requesting to limit annual operating hours to avoid possible future Title V applicability associated with relocation of a portable source. Hours of operation are therefore being limited to 2,500 hours as a rolling 12-month summation for each of P001 and P002 in accordance with OAC rule 3745-35-07(B). Based on the rolling 12-month hours of operation limitation, rolling 12-month emissions limits have been established at the following:

P001: 22.5 tons NO_x, 5.5 tons CO, 3.8 tons SO₂, 0.4 ton PE, and 0.7 ton VOC

P002: 5.4 tons NO_x, 1.3 tons CO, 0.4 tons SO₂, 0.4 ton PE, and 0.5 ton VOC

D. Conclusion

The operational restrictions, emission limits, record keeping and reporting requirements of this permit are sufficient to provide federally enforceable limitations to limit the potential to emit from P001 and P002. With issuance of this permit, the federally enforceable facility-wide potential to emit for Mar-Zane Plant 12 will be 42.3 TPY NO_x, 40.73 TPY CO, 19.3 TPY SO₂, 22.4 TPY PE(stack), and 12.75 TPY VOC.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
MUSKINGUM COUNTY
Application No: 06-07226**

CERTIFIED MAIL

DATE: 9/2/2003

Mar Zane Plant No 12
Ronald Morrison
PO Box 1585
Zanesville, OH 43701

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1100** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

cc: USEPA

SEDO

WV

MUSKINGUM COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07226 FOR AN AIR CONTAMINANT SOURCE FOR
MAR ZANE PLANT NO 12**

On 9/2/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Mar Zane Plant No 12**, located at **3570 South River Rd, Zanesville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07226:

Material Handling.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Kay Gilmer, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 06-07226

Application Number: 06-07226
APS Premise Number: 0660000080
Permit Fee: **To be entered upon final issuance**
Name of Facility: Mar Zane Plant No 12
Person to Contact: Ronald Morrison
Address: PO Box 1585
Zanesville, OH 43701

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3570 South River Rd
Zanesville, Ohio**

Description of proposed emissions unit(s):

Material Handling.

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

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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

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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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(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>
NOx	27.9
CO	6.8
SO ₂	4.2
PE(stack)	0.8
PE(fugitive)	15.5
VOC	1.2

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - Plant unpaved roadways and parking areas (Portable with Mar-Zane Plant 12)	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 12.5 tons per year (TPY). No visible PE except for 3 minutes during any 60-minute period. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.(see Sections A.2.b through A.2.g).
	OAC rule 3745-17-08 (B), (B)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07 (B)(5)	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. Additional Terms and Conditions

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

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unpaved roadways:
all

unpaved parking areas:
all

- 2.b** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to the following methods to ensure compliance: the application of water and/or emulsified asphalt at sufficient treatment frequencies to control fugitive dust; and a vehicle speed reduction to 5 mph on unpaved surfaces. 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 or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using any combination of flushing, sweeping, and/or watering. 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.
- 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 requirements of OAC rule 3745-31-05.

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 and parking areas in accordance with the following frequencies:

<u>unpaved roadways</u>	<u>minimum inspection frequency</u>
all	daily

<u>unpaved parking areas</u>	<u>minimum inspection frequency</u>
all	daily

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee 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 quarterly basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

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1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

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. Emission Limitation:
No visible particulate emissions except for 3 minutes during any 60-minute period.

Applicable Compliance Method:
Compliance 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)(d) of OAC rule 3745-17-03.
 - b. Emission Limitation:
Particulate emissions shall not exceed 12.5 TPY.

Applicable Compliance Method:
Compliance shall be determined based on the emissions factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.2 (Draft, 2001). Initial compliance has been determined using inputs representing current conditions as follows:

$$E = [k(s/12)^a(W/3)^b[(365-p)/365]]$$

Where:

Mar
PTI

Emissions Unit ID: **F001**

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E = size-specific emission factor (lb/VMT)
s = silt content of road surface material (%) = 10 %
W = mean vehicle weight (tons) = 25
a = constant (dimensionless) = 0.7
b = constant (dimensionless) = 0.45
k = particle size multiplier (dimensionless) = 4.9
p = number of rain days per year >0.01 in = 130

Therefore, E = 7.21 lbs particulate/VMT

Maximum travel = 34,800 VMT/year

$(34,800 \text{ VMT/yr})(7.21 \text{ lbs/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 125 \text{ TPY uncontrolled PE}$

Assume 90% control for roadway watering and emulsified asphalt application (RACM, Table 2.1.1-3)

$(125 \text{ tons/year})(.10) = 12.5 \text{ TPY controlled PE}$

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 Southeast District Office (SEDO) 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 SEDO'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

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PTI /

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Emissions Unit ID: **F001**

notice of the relocation.

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

3. In order for the SEDO 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 SEDO (2195 Front Street, Logan, Ohio 43138) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the SEDO 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 and PSD 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".

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
F002 - Plant load-in and load-out of storage piles (Portable with Mar-Zane Plant 12)	OAC rule 3745-31-05 (A)(3) OAC rule 3745-17-08 (B) OAC rule 3745-17-07 (B)(6)
wind erosion from storage piles	OAC rule 3745-31-05 (A)(3)

Applicable Emissions
Limitations/Control Measures

Particulate emissions (PE) shall not exceed 0.4 ton per year (TPY).

No visible PE except for 1 minute during any 60-minute period.

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

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate emissions (PE) shall not exceed 2.6 TPY.

No visible PE except for 1 minute during any 60-minute period.

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

The emission limitation specified by

this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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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:

storage pile identification
all

- 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 minimizing the drop height of the front end loader bucket to the extent possible, in order to minimize or eliminate visible emissions of fugitive dust from the loading area. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- 2.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 maintenance of low storage pile heights to minimize or eliminate visible emissions of fugitive dust from storage pile wind erosion. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.f** Implementation of the above-mentioned control measures in accordance with the terms and

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conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

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:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	daily

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

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

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

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

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

Emissions Unit ID: **F002**

5. The purpose of the inspections is to determine the need for implementing BAT control measures for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
6. The permittee shall maintain records of the following information:

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- a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. The date of each inspection where it was determined by the permittee that it was necessary to implement control measures;
- c. The dates the control measures were implemented; and
- d. On a calendar quarter basis, the total number of days control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 6.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

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. Emission Limitation:
No visible particulate emissions except for 1 minute during any 60-minute period.

Applicable Compliance Method:

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Emissions Unit ID: **F002**

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Compliance 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.

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- b. Emission Limitation:
Particulate emissions from plant load-in and load-out of storage piles shall not exceed 0.4 TPY.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor calculation for drop operations associated with storage piles in AP-42 section 13.2.4 (January, 1995). Initial compliance has been determined using inputs representing current conditions as follows:

$$E = k (0.0032)[(U/5)^{1.3}/(M/2)^{1.4}]$$

Where:

E = emission factor expressed in pounds (lbs) / ton

k = particle size multiplier for TSP (dimensionless) = 0.74

U = mean wind speed expressed in miles per hour (MPH) = 8.1

M = material moisture content (%) = 7

Therefore, $E = 7.67 \times 10^{-4}$ lb PE/ton

maximum annual load-in throughput = 522,000 tons/year

maximum annual load-out throughput = 522,000 tons/year

$$\begin{aligned} & [(522,000 \text{ tons/yr})(7.67 \times 10^{-4} \text{ lb PE/ton}) + (522,000 \text{ ton/yr})(7.67 \times 10^{-4} \text{ lb PE/ton})] / 2000 \text{ lb/ton} \\ & = 0.4 \text{ TPY} \end{aligned}$$

- c. Emission Limitation:
Particulate emissions from wind erosion of storage piles shall not exceed 2.6 TPY.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor calculation for wind erosion from storage piles in BACM, Equation 2-12 (September, 1992). Initial compliance has been determined using inputs representing current conditions as follows:

$$E = 1.7(s/1.5)((365-p)/235)(f/15)$$

Where:

E = emission factor expressed in pounds (lbs) /day/acre

s = silt content of road surface material (%) = 9 %
p = number of rain days per year > 0.01 in = 130
f = percentage of time wind speed exceeds 12 mph (%) = 10
A = total surface area of storage piles (acres) = 3

Therefore, E = 6.8 lbs/day/acre

$(6.8 \text{ lbs/day/acre})(365 \text{ days/yr})(3 \text{ acres})/2000 \text{ lbs/ton} = 3.7 \text{ TPY uncontrolled PE}$

Assume 30% control for precautionary operating practices (RACM, Table 2.1.1-8)
 $(3.7 \text{ tons/year})(.70) = 2.6 \text{ TPY controlled PE}$

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 Southeast District Office (SEDO) 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 SEDO'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;

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- 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 this section, shall be valid for no longer than three years and are subject to renewal.

- 3. In order for the SEDO 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 SEDO (2195 Front Street, Logan, Ohio 43138) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the SEDO 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 and PSD 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".

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P001 - 750 HP diesel generator, 600 KVA (Portable with Mar-Zane Plant 12)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(5)(b)
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-18-06(B)
		OAC rule 3745-23-06(B)
		OAC rule 3745-35-07(B)

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Emissions Unit ID: **P001**

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Applicable Emissions
Limitations/Control Measures

Emissions shall not exceed:

3.0 pounds per hour (lbs/hr) of sulfur dioxide (SO₂);

18.0 lbs/hr of nitrogen oxides (NO_x);

0.5 lb/hr of volatile organic compounds (VOC); and

4.4 lbs/hr of carbon monoxide (CO).

The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-17-11(B)(5)(b) and 3745-17-07(A).

Emissions shall not exceed, as a rolling 12-month summation:

3.8 tons SO₂

22.5 tons NO_x

0.7 ton VOC

5.5 tons CO

0.4 ton particulate emissions (PE)

See Section B.2. below.

Emissions shall not exceed 0.062 lb PE/million Btu of actual heat input.

Visible emissions shall not exceed

20% opacity as a six-minute average, except as provided by rule

See Section A.2.a. below.

See Section A.2.b. below.

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Emissions Unit ID: P001

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2. Additional Terms and Conditions

- 2.a** This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).
- 2.b** The permittee has satisfied the "latest available control techniques and operating practices required pursuant to OAC rule 3745-23-06(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.

B. Operational Restrictions

1. The permittee shall only burn low sulfur No. 2 or diesel fuel, containing less than 0.5% sulfur by weight, in this emissions unit.
2. The permittee has requested a federally enforceable limitation on operating hours for purposes of limiting potential to emit to avoid possible future Title V applicability associated with relocation of a portable source. Therefore, the maximum number of operating hours for emissions unit P001 shall not exceed 2,500 hours based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

<u>Month(s)</u>	<u>Maximum Cumulative Operating Hours</u>
1-1	744
1-2	1,488
1-3	2,232
1-4	2,500
1-5	2,500
1-6	2,500
1-7	2,500
1-8	2,500
1-9	2,500
1-10	2,500
1-11	2,500
1-12	2,500

After the first 12 calendar months of operation following the startup of emissions unit P001, compliance with the annual operating hours limitation shall be based upon a rolling 12-month

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summation of the operating hours.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain documentation on the sulfur content of all fuels received.
2. For each day during which the permittee burns a fuel other than low sulfur No. 2 or diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall maintain monthly records of the following information:
 - a. The hours of operation for P001 for each month.
 - b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative hours of operation, calculated by adding the current month's operating hours to the operating hours for each calendar month since the issuance of this permit.
 - c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the hours of operation, calculated by adding the current month's operating hours to the operating hours for the preceding eleven calendar months.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than low sulfur No. 2 or diesel fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.
 - b. Any exceedance of the rolling 12-month hours of operation limitation.
 - c. Any exceedance of the sulfur content fuel restriction specified in Section B.1.

These deviation (excursion) reports shall be submitted in accordance with Section A.2. of the General Terms and Conditions of this permit.

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. Emissions Limitation:
Emissions shall not exceed 3.0 lbs/hr SO₂.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the emission factor from AP-42, Table 3.4-1, 10/1996 (0.00809S lb/HP-hr) by the maximum allowable sulfur content (0.5%) and the maximum rated capacity of P001 (750 HP).

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 8. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

- b. Emissions Limitation:
Emissions shall not exceed 3.8 tons SO₂ as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly SO₂ emission rate by the total number of hours operated per twelve month rolling period, as recorded in Section C.3.c, and dividing by 2000 lbs/ton.

- c. Emissions Limitation:
Emissions shall not exceed 18.0 lbs/hr NO_x.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the emission factor from AP-42, Table 3.4-1, 10/1996 (0.024 lb/HP-hr) by the maximum rated capacity of P001 (750 HP).

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 7. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

- d. Emissions Limitation:
Emissions shall not exceed 22.5 tons NO_x as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly NO_x emission rate by the total

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number of hours operated per twelve month rolling period, as recorded in Section C.3.c, and dividing by 2000 lbs/ton.

- e. Emissions Limitation:
Emissions shall not exceed 0.5 lb/hr VOC.
Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the emission factor from AP-42, Table 3.4-1, 10/1996 (0.000705 lb/HP-hr) by the maximum rated capacity of P001 (750 HP).

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

- f. Emissions Limitation:
Emissions shall not exceed 0.7 ton VOC as a rolling 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the hourly VOC emission rate by the total number of hours operated per twelve month rolling period, as recorded in Section C.3.c, and dividing by 2000 lbs/ton.

- g. Emissions Limitation:
Emissions shall not exceed 4.4 lbs/hr CO.

Applicable Compliance Method:
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.4-1, 10/1996 (0.85 lb/mmBtu) by the maximum heat input of P001 (5.166 mmBtu/hr).

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

- h. Emissions Limitation:
Emissions shall not exceed 5.5 tons CO as a rolling 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by multiplying the hourly CO emission rate by the total number of hours operated per twelve month rolling period, as recorded in Section C.3.c, and dividing by 2000 lbs/ton.

- i. Emissions Limitation:
0.062 lb PE/million Btu of actual heat input.

Applicable Compliance Method:
Compliance shall be determined based on the emission factor of 0.062 lb/mmBtu specified in AP-42, Table 3.4-2, 10/1996.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.
 - j. Emissions Limitation:
Emissions shall not exceed 0.4 ton PE as a rolling 12-month summation.

Applicable Compliance Method:
Compliance shall be determined by multiplying the PE emission limitation of 0.062 lb/mmBtu of actual heat input by the maximum heat input of P001 (5.166 mmBtu/hr) and by the total number of hours operated per twelve month rolling period, as recorded in Section C.3.c., and dividing by 2000 lbs/ton.
 - k. Emissions Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.
2. Compliance with the operational restrictions in Section B of these terms and conditions shall be determined in accordance with the following methods:
- a. Operational Limitation:
Sulfur content of fuel restricted to less than 0.5%, by weight

Applicable Compliance Method:
Compliance shall be based on recordkeeping as specified in Section C.1. of this permit.
 - b. Operational Limitation:
Maximum of 2,500 hours of operation as a rolling 12-month summation

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Applicable Compliance Method:

Compliance shall be based on recordkeeping as specified in Section C.3. of this permit.

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 Southeast District Office (SEDO) 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 SEDO'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

Emissions Unit ID: **P001**

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 this section, shall be valid for no longer than three years and are subject to renewal.

- 3. In order for the SEDO 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 SEDO (2195 Front Street, Logan, Ohio 43138) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the SEDO 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 and PSD 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".

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5. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P002 - 80 HP diesel generator, 150 KVA (Portable with Mar-Zane Plant 12)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(5)(a)
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-18-06(B)
		OAC rule 3745-23-06(B)
		OAC rule 3745-35-07(B)

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Applicable Emissions
Limitations/Control Measures

See Section A.2.a. below.

See Section A.2.b. below.

Emissions shall not exceed:

0.3 pound per hour (lb/hr) of sulfur dioxide (SO₂);

4.3 lbs/hr of nitrogen oxides (NO_x);

0.4 lb/hr of volatile organic compounds (VOC); and

1.0 lb/hr of carbon monoxide (CO).

The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-17-11(B)(5)(a) and 3745-17-07(A).

Emissions shall not exceed, as a 12 month rolling summation:

0.4 ton SO₂

5.4 tons NO_x

0.5 ton VOC

0.4 ton particulate emissions (PE)

1.3 tons CO

See Section B.2. below.

0.310 lb PE/million Btu of actual heat input.

Visible emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a** This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).
- 2.b** The permittee has satisfied the "latest available control techniques and operating practices required pursuant to OAC rule 3745-23-06(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.

B. Operational Restrictions

- 1. The permittee shall only burn low sulfur No. 2 or diesel fuel, containing less than 0.5% sulfur by weight, in this emissions unit.
- 2. The permittee has requested a federally enforceable limitation on operating hours for purposes of limiting potential to emit to avoid possible future Title V applicability associated with relocation of a portable source. Therefore, the maximum number of operating hours for emissions unit P002 shall not exceed 2,500 hours based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

<u>Month(s)</u>	<u>Maximum Cumulative Operating Hours</u>
1	744
1-2	1,488
1-3	2,232
1-4	2,500
1-5	2,500
1-6	2,500
1-7	2,500
1-8	2,500
1-9	2,500
1-10	2,500
1-11	2,500
1-12	2,500

After the first 12 calendar months of operation following the startup of emissions unit P002, compliance with the annual operating hours limitation shall be based upon a rolling 12-month summation of the operating hours.

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Emissions Unit ID: **P002**

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain documentation on the sulfur content of all fuels received.
2. For each day during which the permittee burns a fuel other than low sulfur No. 2 or diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall maintain monthly records of the following information:
 - a. The hours of operation for P002 for each month.
 - b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative hours of operation, calculated by adding the current month's operating hours to the operating hours for each calendar month since the issuance of this permit.
 - c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the hours of operation, calculated by adding the current month's operating hours to the operating hours for the preceding eleven calendar months.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than low sulfur No. 2 or diesel fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.
 - b. Any exceedance of the rolling 12-month hours of operation limitation.
 - c. Any exceedance of the sulfur content fuel restriction specified in Section B.1.

These deviation (excursion) reports shall be submitted in accordance with Section A.2. of the General Terms and Conditions of this permit.

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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. Emissions Limitation:
Emissions shall not exceed 0.3 lb/hr SO₂.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.29 lb/mmBtu) by the maximum heat input of P002 (0.959 mmBtu/hr).

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 8. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

- b. Emissions Limitation:
Emissions shall not exceed 0.4 ton SO₂ as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly SO₂ emission rate by the total number of hours operated per twelve month rolling period, as recorded in Section C.3.c, and dividing by 2000 lbs/ton.

- c. Emissions Limitation:
Emissions shall not exceed 4.3 lbs/hr NO_x.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (4.41 lbs/mmBtu) by the maximum heat input of P002 (0.959 mmBtu/hr).

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 7. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

- d. Emissions Limitation:
Emissions shall not exceed 5.4 tons NO_x as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly NO_x emission rate by the total

number of hours operated per twelve month rolling period, as recorded in Section C.3.c, and dividing by 2000 lbs/ton.

- e. Emissions Limitation:
Emissions shall not exceed 0.4 lb/hr VOC.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.36 lb/mmBtu) by the maximum heat input of P002 (0.959 mmBtu/hr).

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

- f. Emissions Limitation:
Emissions shall not exceed 0.5 ton VOC as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly VOC emission rate by the total number of hours operated per twelve month rolling period, as recorded in Section C.3.c, and dividing by 2000 lbs/ton.

- g. Emissions Limitation:
Emissions shall not exceed 1.0 lb/hr CO.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor from AP-42, Table 3.3-1, 10/1996 (0.95 lb/mmBtu) by the maximum heat input of P002 (0.959 mmBtu/hr).

Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

- h. Emissions Limitation:
Emissions shall not exceed 1.3 tons CO as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly CO emission rate by the total number of hours operated per twelve month rolling period, as recorded in Section C.3.c, and dividing by 2000 lbs/ton.

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- i. Emissions Limitation:
0.31 lb PE/million Btu of actual heat input.

Applicable Compliance Method:
Compliance shall be determined based on the emission factor of 0.31 lb/mmBtu specified in AP-42, Table 3.3-1, 10/1996.

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If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

- j. Emissions Limitation:
Emissions shall not exceed 0.4 ton PE as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by multiplying the PE emission limitation of 0.31 lb/mmBtu of actual heat input by the maximum heat input of P002 (0.959 mmBtu/hr) and by the total number of hours operated per twelve month rolling period, as recorded in Section C.3.c., and dividing by 2000 lbs/ton.

- k. Emissions Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- 2. Compliance with the operational restrictions in Section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Operational Limitation:
Sulfur content of fuel restricted to less than 0.5%, by weight

Applicable Compliance Method:

Compliance shall be based on recordkeeping as specified in Section C.1. of this permit.

- b. Operational Limitation:
Maximum of 2,500 hours of operation as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be based on recordkeeping as specified in Section C.3. of this permit.

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 Southeast District Office (SEDO) 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 SEDO'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 this section, shall be valid for no longer than three years and are subject to renewal.

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3. In order for the SEDO 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 SEDO (2195 Front Street, Logan, Ohio 43138) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the SEDO and/or the appropriate field office having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

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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 and PSD 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".

5. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T002 - 25,000 gallon asphalt cement storage tank (Portable with Mar-Zane Plant 12)	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 0.01 ton per year.
		See Section A.2.a.
	40 CFR Part 60 Subpart Kb	The requirements of this rule also include compliance with the requirements of 40 CFR 60 Subpart Kb.
		See Sections A.2.b, C.1., and D.1.
	OAC rule 3745-21-09(L)	Exempt, see Section A.2.c.

2. Additional Terms and Conditions

- 2.a This emissions unit shall employ submerged fill.
- 2.b The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.c In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

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B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. In accordance with 40 CFR Part 60.116b(a) and 40 CFR Part 60.116b(b), the permittee shall keep readily accessible records for the life of the tank that document the dimensions and capacity of the tank.

D. Reporting Requirements

1. The following source is subject to the applicable provision of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T002	25,000 gallon AC storage tank	Subpart Kb

Pursuant to NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. Construction date (no later than 30 days after such date);
- b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. Actual start-up date (within 15 days after such date); and
- d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC- Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and

Southeast District Office
Division of Air Pollution Control
2195 Front Street

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E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
VOC emissions shall not exceed 0.01 ton per year.

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Applicable Compliance Method:

VOC emissions due to standing and withdrawal losses from the storage tanks shall be determined using the most recent version of USEPA's "Tanks" program and the physical and chemical characteristics of asphalt cement, as stored, or an equivalent worst case material.

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 Southeast District Office (SEDO) 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 SEDO'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

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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

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- 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 this section, shall be valid for no longer than three years and are subject to renewal.

3. In order for the SEDO 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 SEDO (2195 Front Street, Logan, Ohio 43138) and the appropriate office having jurisdiction over the new site. Upon receipt of the notice, the SEDO 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 and PSD 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".