



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MUSKINGUM COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 06-07435

DATE: 8/12/2004

Mar-Zane Inc Plant 21
Ron Morrison
PO Box 1585
Zanesville, OH 43702

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

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

cc: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/12/2004
Effective Date: 8/12/2004**

FINAL PERMIT TO INSTALL 06-07435

Application Number: 06-07435
APS Premise Number: 0660010241
Permit Fee: **\$400**
Name of Facility: Mar-Zane Inc Plant 21
Person to Contact: Ron Morrison
Address: PO Box 1585
Zanesville, OH 43702

Location of proposed air contaminant source(s) [emissions unit(s)]:
**PO Box 1585
Zanesville, Ohio**

Description of proposed emissions unit(s):
Roadways and Stockpiles.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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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.

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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>
PE (fugitive)	50.5

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property,
and/or Equipment

Applicable Rules/Requirements

F001 - Plant paved roadways and parking areas (Portable with Mar-Zane Plant 21) OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07 (B)(5)

OAC rule 3745-17-08 (B), (B)(2)

OAC rule 3745-17-07 (B)(4)

OAC rule 3745-17-08 (B), (B)(8), (B)(9)

Plant unpaved roadways and parking areas OAC rule 3745-31-05(A)(3)

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PTI A

Issued: 8/12/2004

Emissions Unit ID: **F001**

Applicable Emissions
Limitations/Control Measures

Particulate emissions (PE) shall not exceed 39.1 ton per year (TPY).

No visible PE except for one 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.a, A.2.c, and A.2.e through A.2.i)

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).

PE shall not exceed 8.2 TPY.

No visible PE except for three 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 and A.2.d through A.2.i)

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).

2. Additional Terms and Conditions

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

paved roadways:

all

paved parking areas:

all

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

unpaved roadways:

all

unpaved parking areas:

all

- 2.c** The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to the following methods to ensure compliance: the application of water at sufficient treatment frequencies to control fugitive dust; and a vehicle speed reduction to 5 mph on paved surfaces. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.d** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to 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.e** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has

Emissions Unit ID: **F001**

occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

- 2.f** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.g** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.h** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.i** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC 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 the roadways and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all	daily

<u>unpaved roadways and 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 3.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

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

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:
 Particulate emissions shall not exceed 39.1 TPY from paved roadways and parking areas.

Applicable Compliance Method:

Compliance shall be determined based on the emissions factor calculation for paved roadways and parking areas in AP-42 section 13.2.1 (12/03). Initial compliance has been determined using inputs representing current conditions as follows:

$$E = [k(sL/2)^{0.65}(W/3)^{1.5} - C][1 - (P/4N)]$$

where:

E = size-specific emission factor (lb/VMT)

k = particle size multiplier (dimensionless) = 0.082

sL = road surface silt loading (g/m²) = 120

W = mean vehicle weight (tons) = 25

C = emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear = 0.00047

P = number of rain days per year >0.01 in = 130

N = number of days in the averaging period = 365

Therefore, E = 25.7 lb PE/VMT

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Emissions Unit ID: F001

Maximum travel = 15,200 VMT/year

$(15,200 \text{ VMT/yr})(25.7 \text{ lbs/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 195.5 \text{ TPY uncontrolled PE}$

Assume 80% control for roadway watering (RACM, Table 2.1.1-3)
 $(195.5 \text{ TPY})(.20) = 39.1 \text{ TPY controlled PE}$

- b. Emission Limitation:
 No visible PE except for one minute during any 60-minute period from paved roadways and parking areas.

Applicable Compliance Method:

If required, 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").

- c. Emission Limitation:
 Particulate emissions shall not exceed 8.2 TPY from unpaved roadways and parking areas.

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 (12/03). Initial compliance has been determined using inputs representing current conditions as follows:

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

Where:

E = size-specific emission factor (lb/VMT)

s = silt content of road surface material (%) = 4.8 %

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 = 4.3 lbs particulate/VMT

Maximum travel = 38,000 VMT/year

$$(38,000 \text{ VMT/yr})(4.3 \text{ lbs/VMT})(1 \text{ ton}/2000 \text{ lbs}) = 82.0 \text{ TPY uncontrolled PE}$$

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

$$(82.0 \text{ tons/year})(.10) = 8.2 \text{ TPY controlled PE}$$

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PTI A

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- d. Emission Limitation:
No visible PE except for three minutes during any 60-minute period from unpaved roadways and parking areas.

Applicable Compliance Method:

If required, 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").

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.

- 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 21)	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-17-07 (B)(6)
	OAC rule 3745-17-07 (B)(6)	OAC rule 3745-17-08 (B)
	OAC rule 3745-17-08 (B)	
wind erosion from storage piles	OAC rule 3745-31-05 (A)(3)	

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PTI A

Issued: 8/12/2004

Emissions Unit ID: **F002**

Applicable Emissions
Limitations/Control Measures

Particulate emissions (PE) shall not exceed 0.6 ton per year (TPY).

No visible PE except for one 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 one 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).

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 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:

storage pile identification
all

minimum wind erosion inspection frequency
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.

Emissions Unit ID: **F002**

Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

5. The purpose of the inspections is to determine the need for implementing 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:
 - 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:
Particulate emissions shall not exceed 0.6 TPY from plant load-in and load-out of storage piles.

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 (01/95). 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) = 9

M = material moisture content (%) = 7

Therefore, $E = 8.8 \times 10^{-4}$ lb PE/ton

maximum annual load-in throughput = 684,000 tons/year

maximum annual load-out throughput = 684,000 tons/year

$$\begin{aligned} & [(684,000 \text{ tons/yr})(8.8 \times 10^{-4} \text{ lb PE/ton}) + (684,000 \text{ tons/yr})(8.8 \times 10^{-4} \text{ lb} \\ & \text{PE/ton})] / 2000 \text{ lb/ton} \\ & = 0.6 \text{ TPY} \end{aligned}$$

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

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:

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

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, $E = 6.8 \text{ lbs/day/acre}$

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

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

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

Applicable Compliance Method:

If required, 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").

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;

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- 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.

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".