

Facility ID: 0640010103 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0640010103 Emissions Unit ID: F004 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
F004 - Roadways and Parking Areas	OAC rule 3745-31-05(A)(3) (PTI #06-05379, 2/9/98)	no visible particulate emissions (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.b, and A.2.e through A.2.i)
	OAC rule 3745-31-05(A)(3)	Total particulate emissions (PE) from paved and unpaved roadway areas combined shall not exceed 0.75 tons per year no visible particulate emissions except for 3 minutes during any 60-minute period
	OAC rule 3745-17-07(B)(1)	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.i) This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (B) pursuant to OAC rule 3745-17-07 (B) (11)(e).
	OAC rule 3745-17-08(B)	This emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

2. Additional Terms and Conditions

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

All Paved and Unpaved Roadways and Parking Areas

The permittee shall employ best available control measures on all unpaved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved roadway that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

Any unpaved roadway, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using appropriate dust control measures for paved surfaces. Any unpaved roadway that takes the

characteristics of a paved roadway due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways. Any unpaved roadway that is paved shall be subject to a visible emission limitation of no visible PE except for one minute during any 60-minute period.

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.

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.

The permittee shall apply dust suppressants to the unpaved roadway and parking areas to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic. Water shall be used as the dust suppressant, and the following equipment shall be used for the periodic applications: water sprinkling system with a recovery tank. The dust suppressant shall be applied to the unpaved surfaces, as needed to comply with the allowable particulate emission rate. This term and condition shall be waived during wet conditions when there is sufficient moisture to prevent visible emissions of fugitive dust.

A maximum speed limit of 10 miles per hour shall be posted and enforced on all unpaved roadways and parking areas on the property.

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

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping 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:

All Paved and Unpaved Roadways and Parking Areas

minimum inspection frequency: 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 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 which include the following information for the unpaved roadways and parking areas:
- the date and time dust suppressants were applied to the unpaved surfaces;
 - the portions of the unpaved surfaces that were treated with dust suppressants;
 - the application rate of water and any chemical additives (gallons of each per square yard); and,
 - the name of the equipment operator responsible for the application of the dust suppressants.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
- 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
 - each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Emission Limitation:
- No visible PE except for 3 minutes during any 60-minute period on unpaved areas and 1 minute during any 60-minute period on paved areas.

Compliance Method:

If required, compliance with the emission limitation for the roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

2. Emission Limitation:

Total particulate emissions (PE) shall not exceed 0.75 tons per year.

Compliance Method:

The emission factor calculation for unpaved roadways and parking areas in AP-42 section 13.2.2-3 (October, 2001) shall be utilized to determine compliance. Initial compliance has been determined using inputs representing Potential To Emit (PTE) conditions as follows:

$$E = K (S/12)^{**a} (W/3)^{**b} ((365 - P)/365)$$

Where

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

a = 0.7

b = 0.45

K = particle size multiplier = 4.9

S = silt content of road surface material % = 1.2

W = mean vehicle weight (tons) = 28.2

P = number of "wet" days with at least 0.01 inch of precipitation during period = 145

N = number of days in averaging period = 365

VMT/yr = 10,000 miles per year total

91% control efficiency

Now, to calculate the actual emissions, multiply the emission factor by VMT/yr and percent control, to obtain the annual allowable emission rates:

Annual: (TPY) = (1.62 lb/VMT) (10,000 VMT/yr) (1 - 0.91) / (2000lbs/ton)

Total (TPY) = 0.75

F. **Miscellaneous Requirements**

1. None