

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **01-08753**

A. Source Description

Ohio Mulch purchased a 800 hp diesel powered biogrinder for yard waste, in addition to the existing 800 hp diesel powered tub grinder, 145 hp diesel powered soils grinder and 70 hp diesel powered grid for production of mulch and soil products.

B. Facility Emissions and Attainment Status

Ohio Mulch initiated operation of the 800 hp diesel powered tub grinder in January 1994 and the soils grinder and power screen in January 2000 for which Ohio EPA issued PTI 01-08446 on 4/23/2002 with a restricted annual emission of 32.9 tons PE/yr and 45.9 tons NOx/yr. Franklin County is an attainment area for all criteria pollutants.

C. Source Emissions

The combined PM30 emissions from the new grinder and paved roadways would add 34.5 tons PM to the existing allowable of 32.9 tons to yield 67.5 tons which is less than the Title V threshold of 100 tons /yr. At an hourly emission rate of 12.12 lbs NOx/hr from the 800 diesel powered grinder would result in potential emissions of 53.2 tons per year. In order to avoid an increase of 25 tons NOx/yr, Ohio Mulch is proposing to restrict the operation of the biogrinder to 3,800 hrs/yr.

D. Conclusion

Because the emissions from the biogrinder have the potential to exceed 50 tons per year, Ohio Mulch is proposing to restrict the operation of the tub grinder to 3,800 hours per year. At the restricted annual operating rates, the total facility-wide emissions would not exceed 75 tons NOx/yr and 67.4 tons PE.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL
FRANKLIN COUNTY
Application No: 01-08753**

DATE: 7/17/2003

Ohio Mulch
Byron Brannon
2140 Advance Ave
Columbus, OH 43207

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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 **\$2900** 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

CDO

FRANKLIN COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL 01-08753 FOR AN AIR CONTAMINANT SOURCE FOR OHIO MULCH

On 7/17/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ohio Mulch**, located at **2140 Advance Ave, Columbus, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08753:

Biogrinder 1000 grinder with 800 hp diesel engine.

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.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



**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 01-08753

Application Number: 01-08753

APS Premise Number: 0125042476

Permit Fee: **To be entered upon final issuance**

Name of Facility: Ohio Mulch

Person to Contact: Byron Brannon

Address: 2140 Advance Ave
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2140 Advance Ave
Columbus, Ohio**

Description of proposed emissions unit(s):
Biogrinder 1000 grinder with 800 hp diesel engine.

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 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 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>
PE	35.2
NO _x	23.0
SO ₂	2.1
CO	8.0
OC	0.5

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F004- Biogrind 1000 grinder (30 ton/hr)	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 2.1 lbs/hr and 4.0 tons/yr from the biogrinder. See section B.1 below.
	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.b through A.2.d.
	OAC rule 3745-17-08(B)	Compliance with this rule also includes compliance with OAC rules 3745-17-07(B)(1) and 3745-17-08(B).
		Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average.
		The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
800 hp diesel engine	OAC rule 3745-31-05(A)(3)	NOx emissions shall not exceed 12.1 lbs/hr. CO emissions shall not exceed 4.2 lbs/hr. SOx emissions shall not exceed 1.1 lbs/hr. OC emissions shall not exceed 0.3 lb/hr. PE from the diesel engine exhaust stack shall not exceed 0.9 lb/hr.

	See section A.2.e and B.2 below.
OAC rule 3745-17-11 (B)(5)(b)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(5)(b), 3745-17-07(A) and 3745-18-06(G). PE from a large bore diesel engine exhaust stack shall not exceed 0.062 lb per MMBTU of actual heat input.
OAC rule 3745-17-07 (A)(1)	Visible PE from the diesel engine exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
OAC rule 3745-18-06 (G)	SOx emissions from the diesel engine exhaust stack shall not exceed 0.5 pound per MMBTU of actual heat input.
OAC rule 3745-35-07(D)	NOx emissions shall not exceed 23.0 tons per rolling, 12-month period.
	CO emissions shall not exceed 8.0 tons per rolling, 12-month period.
	SOx emissions shall not exceed 2.1 tons per rolling 12-month period..
	OC emissions shall not exceed 0.5 tons per rolling 12-month period.
	PE from the diesel engine exhaust stack shall not exceed 1.7 tons per rolling 12-month period.
	See section B.1 below.

2. Additional Terms and Conditions

2.a The material handling operation that is covered by this permit and subject to the above-mentioned requirements are listed below:

Biogrinder

2.b The permittee shall employ best available control measures for the above-identified material

handling operation 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 perform the following control measure to ensure compliance:

<u>material handling operation</u>	<u>control measure</u>
Biogrinder	Water spray

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure is necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure is unnecessary.
- 2.d 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.
- 2.e The hourly combustion emissions of NO_x, SO₂, CO, OC and PE reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

- 1. The maximum annual operating hours for this emissions unit shall not exceed 3,800, based upon a rolling, 12-month summation of the operating hours.
- 2. The diesel engine shall be operated with diesel fuel with a sulfur content less than 0.5% by weight.

C. Monitoring and/or Recordkeeping Requirements

- 1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation</u>	<u>minimum inspection frequency</u>
Biogrinder	Daily, when operating

- 2. The above-mentioned inspections shall be performed during representative, normal operating conditions.

3. The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measure was implemented;
 - d. on a calendar quarter basis, the total number of days the control measure was implemented; and
 - e. the name of the person reporting each observation.
5. The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit.
6. The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and.
 - b. the rolling, 12-month summation of the operating hours.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

7. The operations log shall be maintained on site.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
 - a. each day when visible emissions were observed, and at which location;
 - b. each day during which an inspection was not performed by the required frequency; and
 - c. each instance when a control measure, that was to be performed 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.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation.
4. The permittee shall submit a deviation report for each day when a fuel other than 0.5% sulfur diesel fuel was burned in this emissions unit. This report shall be submitted within 30 days after the deviation occurred.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation-
PE shall not exceed 2.1 lbs/hr per hour and 4.0 tons/yr from bio-grinder.

Applicable Compliance Method-

Compliance shall be based on a RACM emission factor of 0.35 lb PE/ton wood times the maximum process weight rate of 30 tons/hr and an 80% control efficiency for watering to equal 2.1 lb PE/hr. Compliance with the annual emissions limitation shall be based on record keeping in section C.6.

- b. Emission Limitation-
Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method-

If required, compliance shall be determined through visible emission observations performed in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

- c. Emission Limitation-
Combustion emissions from the diesel engine stack shall not exceed the following: NOx emissions shall not exceed 12.1 lbs/hr and 23.0 tons/yr; CO emissions shall not exceed 4.2 lbs/hr and 8.0 tons/yr; SOX emissions shall not exceed 1.1 lbs/hr and 2.1 tons/yr ; and OC emissions shall not exceed 0.30 lbs/hr and 0.50 tons/yr; and PE shall not exceed 1.0 lbs/hr and 1.7 tons/yr.

Applicable Compliance Method-

Compliance with the emission limitations identified above for the diesel engine shall be determined by using the emission factors from Caterpillar 800 hp diesel engine. Compliance with the annual emissions limitation shall be based on record keeping in section C.6.

$5,510 \text{ g NOX/hr} * 1 \text{ lb/454 g} = 12.1 \text{ lbs/hr} * 3,800 \text{ hrs/yr} * 1 \text{ ton/2000 lb} = 23.0 \text{ tons/yr}$
 $1,907 \text{ g CO/hr} * 1 \text{ lb/454 g} = 4.2 \text{ lbs/hr} * 3,800 \text{ hrs/yr} * 1 \text{ ton/2000 lb} = 8.0 \text{ tons CO/yr}$
 $505 \text{ g SOx/hr} * 1 \text{ lb/454 g} = 1.1 \text{ lbs/hr} * 3,800 \text{ hrs/yr} * 1 \text{ ton/2000 lb} = 2.1 \text{ tons SOx/yr}$
 $117 \text{ g OC/hr} * 1 \text{ lb/454 g} = 0.3 \text{ lbs/hr} * 3,800 \text{ hrs/yr} * 1 \text{ ton/2000 lb} = 0.5 \text{ tons OC/yr}$
 $394 \text{ g PM/hr} * 1 \text{ lb/454 g} = 0.87 \text{ lbs/hr} * 3,800 \text{ hrs/yr} * 1 \text{ ton/2000 lb} = 1.7 \text{ tons PM/yr}$

d. Emission Limitation-

Visible PE from the diesel engine exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method-

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitation-

PE emissions from the diesel engine exhaust stack shall not exceed 0.062 lb per MMBTU of actual heat input.

Applicable Compliance Method-

Compliance with the emissions limitation for the diesel engine identified above shall be determined by using the emission factor for particulate from a diesel engine. This emission factor is 0.31 lb particulate/MMBTU (fuel input) for diesel fuel. (Note: this emission factor is equivalent to the emission factor of 0.0022 lb PM/hp-hr.)

g. Emission Limitation-

SO₂ emissions from the diesel engine exhaust stack shall not exceed 0.5 lb per MMBTU of actual heat input.

Applicable Compliance Method-

Compliance with the emissions limitation for the diesel engine identified above shall be determined by using the emission factor for SO_x from AP-42, 5th Edition (October 1996), Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines." This emission factor is 0.29 lb SO_x/MMBTU (fuel input) for diesel fuel.

F. Miscellaneous Requirements

1. Terms in section B.1, C.6 and D.3 of this permit are federally enforceable.
2. 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 technology for such portable emissions unit;
 - b. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);
 - c. the applicant has provided proper notice of intent to relocate the portable emissions unit to the CDO having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and
 - d. in the CDO 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.
3. Any site approvals issued by the Ohio EPA, pursuant to 2. above, shall be valid for no longer than three years and are subject to renewal.

In order for CDO 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 CDO having jurisdiction over the new site. Upon receipt of the notice, CDO having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio EPA approval prior to relocation of the emissions unit may result in fines and civil penalties.

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>
F005 - Paved roadways and working pads	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 29.5 tons per year. There shall be no visible particulate emissions except for a period of 1- minute during any 60 minute observation period from a paved roadway. Best available control measures shall be sufficient to minimize or eliminate visible emissions of fugitive dust. See A.2.a. and A.2.c. through A.2.h. below
	OAC rule 3745-17-07(B)(4)	The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

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

paved roadways:
 Facility entrance and exit

paved staging areas:

All

- 2.b The permittee shall employ best available control measures on all paved roadways and staging areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee has committed to treat the paved roadways and parking areas by employing good housekeeping practices and applying water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. 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 a paved or 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 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.e Open-bodied vehicles owned by the Ohio Mulch and 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.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 rule 3745-17-08.

B. Operational Restrictions

- 1. A maximum speed limit of 10 miles per hour for vehicular traffic shall be posted and enforced on the roadways and staging areas of this facility.
- 2. The permittee shall comply with storm water control regulations in the application of water dust suppressants. In areas outside of the storm water retention pond drainage catch, the permittee may employ sweeping, vacuum sweeping or alternative control measures.

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 staging areas</u>	<u>minimum inspection frequency</u>
Entrance and exit	daily
All pads	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 staging 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 may, upon receipt of written approval from the Ohio EPA Central District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. 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 kept separately for (i) the paved roadways and staging areas and (ii) the unpaved roadways and staging 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 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.

- 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. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation- Particulate emissions shall not exceed 29.5 ton per year from paved roadways.

Applicable Compliance Method- Compliance shall be determined by the following calculations:

Paved entrance roadway and staging areas - AP-42 emission factor section 13.2.1

$$E = k(sL/2)^{0.65} (W/3)^{1.5} \text{ lbs/VMT}$$

k = particle size multiplier = 0.082 lb/VMT (PM-30 Table 13.2.1-1 AP-42)

sL = silt loading on road surface = 7.4 gm/m² (Table 13.2.1-2)

W = average vehicle weight (tons) = 12 (semi-empty); 20 (semi-full)

Annual vehicle miles traveled = 15,541 VMT/yr

$$E = 0.082(7.4/2)^{0.65} (12/3)^{1.5} = 0.082 * 2.34 * 8 = 1.54 \text{ lbs/VMT (semi-empty)}$$

$$E = 0.082(12/2)^{0.65} (20/3)^{1.5} = 0.082 * 3.2 * 17.2 = 4.52 \text{ lbs/VMT (semi-full)}$$

$$E \text{ (average)} = (1.54 \text{ lbs/VMT (semi-empty)} + 4.52 \text{ lbs/VMT (semi-full)})/2 = 3.8 \text{ lbs/VMT}$$
$$\text{tons PM30/yr} = 3.8 \text{ lbs PM30/VMT} * (15,541 \text{ miles/yr}) * 1 \text{ ton}/2,000 \text{ lb} = 29.5 \text{ tons PM/yr}$$

- b. Emission limitation- There shall be no visible emissions except for a period not to exceed 1 minute during any 60 minute observation period from paved roadways.

Applicable Compliance Method- Compliance with the emission limitation for the paved roadways and parking areas 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.

F. Miscellaneous Requirements

None