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

Permit To Install: **05-14403**

A. Source Description:

RLR Sales is a small mulch manufacturing operation consisting of two 750 HP diesel tub grinders and associated storage piles. The facility converts scrap pallets in to mulch for residential as well as commercial sales. The company has requested a limitation on the annual fuel usage to avoid air modeling.

B. Facility Emissions and Attainment Status:

The facility is located at 2483 State Route 22/3 West in Wilmington, Ohio in Clinton County. Clinton County is classified as non-attainment for ozone.

RLR Sales' facility-wide potential emissions are 163.2 tons for NOx, (combined). This synthetic minor permit to install will limit NOx emissions to 21.46 tons (combined).

The emissions limitations are accomplished by limiting facility wide fuel usage to 95,100 gallons per rolling, 12-month summation (combined). The fuel usage limitation accompanied with proper record keeping and reporting will ensure that RLR Sales maintains compliance with the federally enforceable emission limitations.

C. Source Emissions:

Each air contaminant source are two 750 HP tub grinders and associated mulch storage piles. Each air contaminant source is identical.

Air contaminant emissions from each air source include NOx, SO2, CO, OC, and particulate. At maximum annual potential this emissions unit will emit 21.46 tons NOx, 3.38 tons SO2, 5.7 tons CO, 0.6 tons OC, and 0.75 tons PE (combined).

D. Conclusion:

This synthetic minor permit to install will effectively limit the individual and combined emissions from emissions unit P901 and P902 to levels well below Title V thresholds. The emissions limitations identified in this permit represent all the air contaminant emissions at this facility.

A combination of a rolling, 12-month material usage limitation, monthly record keeping requirements and quarterly deviation reporting requirements shall ensure that compliance with the permit is maintained.

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

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

CERTIFIED MAIL

RE: DRAFT PERMIT TO INSTALL
CLINTON COUNTY
Application No: 05-14403
Fac ID: 0514000187

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

DATE: 3/20/2007

R.L.R. Sales, LLC
Dave Cox
2483 State Route 22/3 West
Wilmington, OH 45177-0271

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, 43216-1049.

A Permit to Install may be issued in proposed of 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 **$7500** 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.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **SWDO** **KY** **IN**

CLINTON COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **05-14403** FOR AN AIR CONTAMINANT SOURCE FOR
R.L.R. Sales, LLC

On 3/20/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **R.L.R. Sales, LLC**, located at **2483 State Route 22/3 West, Wilmington**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-14403:

Mulch Production consisting of two Morbark Tub Grinders and storage piles.

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.

Jeff Hines, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911
[(937)285-6357]

DRAFT PERMIT TO INSTALL 05-14403

Application Number:	05-14403
Facility ID:	0514000187
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	R.L.R. Sales, LLC
Person to Contact:	Dave Cox
Address:	2483 State Route 22/3 West Wilmington, OH 45177-0271

Location of proposed air contaminant source(s) [emissions unit(s)]:
2483 State Route 22/3 West
Wilmington, Ohio

Description of proposed emissions unit(s):
Mulch Production consisting of two Morbark Tub Grinders and storage piles.

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

_____

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
NOx	21.46
CO	5.7
SO2	3.38
PE	11.86
PM10	4.1
OC	0.6

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 - (F001) - Mulch Storage Piles

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	8.2 tons/yr of fugitive particulate emission (PE). 4.1 tons/yr of fugitive particulate matter of 10 microns or less (PM10).

2. Additional Terms and Conditions:

2.a None

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:

storage pile identification	minimum load-in inspection frequency
all	once daily during facility operating hours

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:

storage pile identification	minimum load-out inspection frequency
all	once daily during facility operating hours

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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	minimum wind erosion inspection frequency
all	once daily during facility operating hours

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

5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit 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 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, 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:

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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 limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emissions Limitations:

8.2 tons/year of fugitive PE
4.1 tons/year of fugitive PM10

Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor equations in USEPA BACM Document and Section 13.2.4, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, (revised 11/06), for load-in operations, load-out operations, and wind erosion. These emission limits were based on a maximum production of 465,000 tons per year, a maximum storage surface area less than or equal to 1.55 acres.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P901) - Unit 9334 Morbark Tub Grinder with 750 HP Diesel Engine

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Combined particulate emissions, including fugitive, from emissions units P901 and P902 shall not exceed 3.2 tons per 12-month rolling period. Emissions from the diesel engine shall not exceed the following rates: NOx emissions shall not exceed 37.26 lbs/hr and 21.46 tons/yr for emission units P901 and P902 combined. CO emissions shall not exceed 9.9 lbs/hr and 5.7 tons/yr for emission units P901 and P902 combined. SO_2 emissions shall not exceed 5.88 lb/hr and 3.38 tons/yr for emission units P901 and P902 combined. OC emissions shall not exceed 1.04 lb/hr and 0.6 tons/yr for emission units P901 and P902 combined. PE shall not exceed 0.82 lb/hr and 0.46 tons/yr for emission units P901 and P902 combined.
OAC rule 3745-17-11(B)(5)	PE from engine exhaust shall not exceed 0.062 lb/mmBTU of actual heat input.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

2. Additional Terms and Conditions:

2.a None

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B. Operational Restrictions;

1. The diesel engine shall be operated with diesel fuel with a sulfur content less than 0.5% by weight.

2. The permittee shall conduct daily inspections and maintain a log for each operation specified below in the "Monitoring and/or Record keeping Requirements" of this permit. Unless requested otherwise by the permitting authority may be met by maintaining visible particulate emissions and fugitive dusts to a minimum with the appropriate control measures (i.e. watering or propose other).

3. The maximum fuel usage for emissions units P901 and P902 shall not exceed 95,100 gallons combined per rolling 12-month period.

Month	Fuel Usage in gallons
1	15850
2	31700
3	47550
4	63400
5	79250
6-12	95100

C. Monitoring and/or Recordkeeping Requirements:

1. Except as otherwise provided in this permit and for operations that are not entirely enclosed, the permittee shall perform inspections in accordance with the following minimum frequencies, to determine if visible particulate emissions are being emitted from the emissions unit:

Operations	Minimum inspection frequency
tub grinder	once daily during operation
loading and unloading activities and transfer points associated with the tub grinder	once daily, during loading, unloading, and transfer operations

2. The permittee shall record the following information in a log for each operation (i.e., tub grinder, and the loading and unloading activities associated with the tub grinder) at the minimum inspection frequency specified above whenever the emissions unit is in operation:

   a. the date and length of time of each inspection;

   b. the presence or absence of any visible particulate emissions and length of time they were observed;

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c. whether the emissions were representative of normal operations, or, for example, if it was an unusually windy day; and

d. the name of the person reporting each observation/inspection.

If no visible particulate emissions were observed at any observation point during any day the emissions unit was in operation, the permittee shall note this in the log along with the date. The operations log shall be maintained on site.

3. The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit and the quantity of diesel fuel used each month.

D. Reporting Requirements:

1. The permittee shall submit deviation (excursion) reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency; and,

   b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

2. The permittee shall submit deviation (excursion) reports which identify each day when a fuel that does not meet the requirements of section B.1 of these terms and conditions was burned in this emissions unit.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which identify any exceedances of the rolling 12-month fuel usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

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. <u>Emission Limitation</u>:
   3.2 tons PE (includes material handling) per 12-month rolling average.

   <u>Applicable Compliance Method</u>:
   Multiply the USEPA Fire 6.23 emission factor of 0.02 pound of particulate emissions per ton of material processed (SCC 3-07-008-01) by the maximum

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hourly process rate times (1-0.9*) times 2 times 8760 hrs/yr divided by 2000 lbs/ton.

*The control efficiency for watering and for the moisture content of the material processed.

b. Emission Limitation:

37.26 pounds of NOx per hour for P901 and P902 combined.

Applicable Compliance Method:

Multiply the AP-42 emission factor of 3.2 pounds of NOx per mmBTU (AP-42 Table 3.4-1 dated 10/96) by the heat input.

c. Emission Limitation:

9.9 pounds of CO per hour for P901 and P902 combined.

Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.85 pound of CO per mmBTU (AP-42 Table 3.4-1 dated 10/96) by the heat input.

d. Emission Limitation:

5.88 pounds of SO2 per hour for P901 and P902 combined.

Applicable Compliance Method:

Multiply the AP-42 derived emission factor of 0.51 pound of SO2 per mmBTU (AP-42 Table 3.4-1 dated 10/96) by the heat input.

e. Emission Limitation:

1.04 pound of OC per hour for P901 and P902 combined.

Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.09 pound of OC per mmBTU (AP-42 Table 3.4-1 dated 10/96) by the heat input.

f. Emission Limitation:

0.82 pounds of PE per hour for P901 and P902 combined.

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Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.0697 pound of particulate emissions per mmBTU (AP-42 Table 3.4-1 or 3.4-2 dated 10/96) by the heat input.

g. Emission Limitations:

0.46 tons of PE per year
21.46 tons of NOx per year
5.7 tons of CO per year
3.38 tons of SO2 per year
0.6 ton of OC per year

Applicable Compliance Method:

Multiply the AP-42 emissions factor of (x.xx) pounds of (pollutant) per mmBTU (AP-42 (10/96) Table 3.4-2 for PE and 3.4-1 for all others) by the annual heat input, then divide by 2000 pounds per ton.

h. Emission Limitation:

Visible particulate emissions from the diesel engine exhaust stack shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

F. Miscellaneous Requirements:

1. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable source may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable source shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:

a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):

i. the portable source was installed after January 1, 1974 and continues to comply with any applicable BAT and state or federal air pollution rule or law; and

ii. the portable source continues to comply with the currently effective permit-to-install or express permit-to-install (registration status) and/or any applicable permit-to-operate; and

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iii. the applicant has provided proper notice of intent to relocate the portable source to the Ohio EPA, Southwest District Office (SWDO) and the appropriate field office having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and

iv. in SWDO's and the appropriate field office's (having jurisdiction over the new site) judgement, the proposed site is acceptable under OAC rule 3745-15-07; and

v. the director has issued a notice stating that in the director's judgement, relocating the source will not result in the installation of a major stationary source or the modification of a major stationary source.

Comment: Relocation of any portable source that results in the installation of a major stationary source or the modification of a major stationary source must also meet all applicable requirements under this chapter, including the requirement to obtain a permit-to-install prior to relocation. Relocation of any portable source that results in the creation of a major source as defined in OAC rule 3745-77-01 must also meet all applicable requirements under the Title V program contained in OAC Chapter 3745-77, which may include the requirement to apply for a Title V permit.

b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable source may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:

i. the portable source continues to comply with currently effective Ohio EPA permit-to-install or express permit-to-install (registration status) and/or any applicable permit-to-operate.

ii. the portable source was issued a permit-to-install and where BAT requirements were defined in that permit-to-install, the portable source continues to comply with any applicable BAT requirements

iii. the portable source owner has identified the proposed site to Ohio EPA;

iv. Ohio EPA has determined that the portable source, at the proposed site, will have an acceptable environmental impact;

v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;

vi. the owner of the proposed site has provided the portable source owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable source to this proposed site; and

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vii. the portable source owner has provided Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

In order for SWDO and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable source must file a " Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the source withSWDO and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, SWDO, and/or appropriate field office 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.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P902) - Unit 9428 Morbark Tub Grinder with 750 HP diesel Engine

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Combined particulate emissions, including fugitive, from emissions units P901 and P902 shall not exceed 3.2 tons per 12-month rolling period. Emissions from the diesel engine shall not exceed the following rates: NOx emissions shall not exceed 37.26 lbs/hr and 21.46 tons/yr for emission units P901 and P902 combined. CO emissions shall not exceed 9.9 lbs/hr and 5.7 tons/yr for emission units P901 and P902 combined. SO_2 emissions shall not exceed 5.88 lb/hr and 3.38 tons/yr for emission units P901 and P902 combined. OC emissions shall not exceed 1.04 lb/hr and 0.6 tons/yr for emission units P901 and P902 combined. PE shall not exceed 0.82 lb/hr and 0.46 tons/yr for emission units P901 and P902 combined.
OAC rule 3745-17-11(B)(5)	PE from engine exhaust shall not exceed 0.062 lb/mmBTU of actual heat input.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

2. Additional Terms and Conditions:

2.a None

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B. Operational Restrictions:

1. The diesel engine shall be operated with diesel fuel with a sulfur content less than 0.5% by weight.

2. The permittee shall conduct daily inspections and maintain a log for each operation specified below in the "Monitoring and/or Record keeping Requirements" of this permit. Unless requested otherwise by the permitting authority may be met by maintaining visible particulate emissions and fugitive dusts to a minimum with the appropriate control measures (i.e. watering or propose other).

3. The maximum fuel usage for emissions units P901 and P902 shall not exceed 95,100 gallons combined per rolling 12-month period.

Month	Fuel Usage in gallons
1	15850
2	31700
3	47550
4	63400
5	79250
6-12	95100

C. Monitoring and/or Recordkeeping Requirements:

1. Except as otherwise provided in this permit and for operations that are not entirely enclosed, the permittee shall perform inspections in accordance with the following minimum frequencies, to determine if visible particulate emissions are being emitted from the emissions unit:

Operations	Minimum inspection frequency
tub grinder	once daily during operation
loading and unloading activities and transfer points associated with the tub grinder	once daily, during loading, unloading, and transfer operations

2. The permittee shall record the following information in a log for each operation (i.e., tub grinder, and the loading and unloading activities associated with the tub grinder) at the minimum inspection frequency specified above whenever the emissions unit is in operation:

   a. the date and length of time of each inspection;

   b. the presence or absence of any visible particulate emissions and length of time they were observed;

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c. whether the emissions were representative of normal operations, or, for example, if it was an unusually windy day; and

d. the name of the person reporting each observation/inspection.

If no visible particulate emissions were observed at any observation point during any day the emissions unit was in operation, the permittee shall note this in the log along with the date. The operations log shall be maintained on site.

3. The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit and the quantity of diesel fuel used each month.

D. Reporting Requirements:

1. The permittee shall submit deviation (excursion) reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency; and,

   b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

2. The permittee shall submit deviation (excursion) reports which identify each day when a fuel that does not meet the requirements of section B.1 of these terms and conditions was burned in this emissions unit.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit annual reports which identify any exceedances of the rolling 12-month fuel usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

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. <u>Emission Limitation</u>:
   3.2 tons PE (includes material handling) per 12-month rolling average.

   <u>Applicable Compliance Method</u>:
   Multiply the USEPA Fire 6.23 emission factor of 0.02 pound of particulate emissions per ton of material processed (SCC 3-07-008-01) by the maximum

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hourly process rate times (1-0.9*) times 2 times 8760 hrs/yr divided by 2000 lbs/ton.

*The control efficiency for watering and for the moisture content of the material processed.

b. Emission Limitation:

37.26 pounds of NOx per hour for P901 and P902 combined.

Applicable Compliance Method:

Multiply the AP-42 emission factor of 3.2 pounds of NOx per mmBTU (AP-42 Table 3.4-1 dated 10/96) by the heat input.

c. Emission Limitation:

9.9 pounds of CO per hour for P901 and P902 combined.

Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.85 pound of CO per mmBTU (AP-42 Table 3.4-1 dated 10/96) by the heat input.

d. Emission Limitation:

5.88 pounds of SO2 per hour for P901 and P902 combined.

Applicable Compliance Method:

Multiply the AP-42 derived emission factor of 0.51 pound of SO2 per mmBTU (AP-42 Table 3.4-1 dated 10/96) by the heat input.

e. Emission Limitation:

1.04 pound of OC per hour for P901 and P902 combined.

Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.09 pound of OC per mmBTU (AP-42 Table 3.4-1 dated 10/96) by the heat input.

f. Emission Limitation:

0.82 pounds of PE per hour for P901 and P902 combined.

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Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.0697 pound of particulate emissions per mmBTU (AP-42 Table 3.4-1 or 3.4-2 dated 10/96) by the heat input.

g. Emission Limitations:

0.46 tons of PE per year
21.46 tons of NOx per year
5.7 tons of CO per year
3.38 tons of SO2 per year
0.6 ton of OC per year

Applicable Compliance Method:

Multiply the AP-42 emissions factor of (x.xx) pounds of (pollutant) per mmBTU (AP-42 (10/96) Table 3.4-2 for PE and 3.4-1 for all others) by the annual heat input, then divide by 2000 pounds per ton.

h. Emission Limitation:

Visible particulate emissions from the diesel engine exhaust stack shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

F. Miscellaneous Requirements:

1. Pursuant to OAC rule 3745-31-03(A)(1)(p), the permittee of a portable source may relocate within the State of Ohio without first obtaining a permit to install (PTI) providing certain criteria are met. The portable source shall meet one of the two following scenarios in order to qualify for this PTI exemption for the new location:

a. The following determinations have been documented, pursuant to OAC rule 3745-31-03(A)(1)(p)(i):

i. the portable source was installed after January 1, 1974 and continues to comply with any applicable BAT and state or federal air pollution rule or law; and

ii. the portable source continues to comply with the currently effective permit-to-install or express permit-to-install (registration status) and/or any applicable permit-to-operate; and

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iii. the applicant has provided proper notice of intent to relocate the portable source to the Ohio EPA, Southwest District Office (SWDO) and the appropriate field office having jurisdiction over the new site within a minimum of 30 days prior to the scheduled relocation; and

iv. in SWDO's and the appropriate field office's (having jurisdiction over the new site) judgement, the proposed site is acceptable under OAC rule 3745-15-07; and

v. the director has issued a notice stating that in the director's judgement, relocating the source will not result in the installation of a major stationary source or the modification of a major stationary source.

Comment: Relocation of any portable source that results in the installation of a major stationary source or the modification of a major stationary source must also meet all applicable requirements under this chapter, including the requirement to obtain a permit-to-install prior to relocation. Relocation of any portable source that results in the creation of a major source as defined in OAC rule 3745-77-01 must also meet all applicable requirements under the Title V program contained in OAC Chapter 3745-77, which may include the requirement to apply for a Title V permit.

b. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable source may relocate within the State of Ohio without first obtaining a PTI, providing the following criteria of OAC rule 3745-31-05(E) are met:

i. the portable source continues to comply with currently effective Ohio EPA permit-to-install or express permit-to-install (registration status) and/or any applicable permit-to-operate.

ii. the portable source was issued a permit-to-install and where BAT requirements were defined in that permit-to-install, the portable source continues to comply with any applicable BAT requirements

iii. the portable source owner has identified the proposed site to Ohio EPA;

iv. Ohio EPA has determined that the portable source, at the proposed site, will have an acceptable environmental impact;

v. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;

vi. the owner of the proposed site has provided the portable source owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable source to this proposed site; and

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vii. the portable source owner has provided Ohio EPA with 15 days written notice of the relocation.

Any site approvals issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal.

In order for SWDO and the appropriate field office having jurisdiction over the new site to determine compliance with all of the above criteria, the permittee of the portable source must file a " Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the source withSWDO and the appropriate field office having jurisdiction over the new site. Upon receipt of the notice, SWDO, and/or appropriate field office 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.

Pursuant to OAC rule 3745-31-05(F), the Director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

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