

GENERAL PERMIT 11.1 TEMPLATE  
TUB GRINDER

## C. Emissions Unit Terms and Conditions

Note: The following are the terms and conditions for a General PTIO to be issued to a non-Title V facility

**1. [Emissions Unit ID], [Company Equipment ID]**

**Operations, Property and/or Equipment Description:**

Tub grinder with less than 950 tons per hour throughput capacities with emissions controlled using wet suppression

a) 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.

b. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) [Best Available Technology]	Visible particulate emissions from any fugitive dust source shall not exceed twenty percent opacity as a three-minute average.  6.2 tons PM10/Year
b.	OAC rule 3745-31-05(F) [Voluntary limits on allowable emissions]	Work practices and operational restriction to minimize or eliminate emissions of fugitive dust  See b)(2)a., b)(2)b., and c)(1).
c.	OAC rule 3745-17-07(B)(1)  (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The visible particulate emission limitation specified by this rule is equivalent to the visible particulate emission limitation established pursuant to ORC 3704.03(T).
d.	OAC rule 3745-17-08(B)  (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The reasonably available control measures specified by this rule are equivalent to the voluntary control measures established pursuant to OAC rule 3745-31-05(F).

(2) Additional Terms and Conditions

- a. The permittee has committed to employing best available control measures for the tub grinder, and loading and unloading activities associated with the tub grinder, for the purpose of ensuring compliance with the visible particulate emission limitation established in this permit.

The permittee shall employ continuous water sprays and other watering or wetting activities on an “as needed” basis to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures instead of, or in addition to, water sprays, including the processing of materials with inherent moisture sufficient to meet the visible particulate emission limitation of this permit.

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 measures are necessary to ensure compliance with the visible particulate emissions requirement. Any required implementation of the control measures shall continue until further observation and documentation demonstrates that use of the control measures is unnecessary.

c) Operational Restrictions

- (1) The maximum operating hours for this emissions unit shall not exceed 4,500 hours per calendar year.
- (2) The permittee shall process only the following materials in this emissions unit:
- (a) yard waste\*
  - (b) agricultural waste\*
  - (c) animal waste\*
  - (d) processed and / or unprocessed vegetables, fruits, or grains\*
  - (e) non-asbestos (Category I or Category II) containing construction and demolition debris in this emissions unit.

\*Feedstock types A, B, C, D, and D1 for composting facilities from OAC rule 3745-27-40

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the grinding and material handling operations in accordance with the following frequencies:

<u>grinding and material handling operations</u>	<u>minimum inspection frequency</u>
All	Each day of operation

The purpose of the inspections is to determine the need for implementing the above-mentioned additional control measures for emissions of fugitive dust. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for this grinding and material handling operation if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements, including ORC 3704.03(T).

- (2) The permittee shall maintain monthly records of the hours of operation of this emissions unit.
- (3) The permittee shall maintain a record of each instance any material other than those permitted in c)(2) was processed.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal (<http://ebiz.epa.ohio.gov>); or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission limitation:

Visible particulate emissions from any fugitive dust source shall not exceed twenty per cent opacity as a three-minute average.

Applicable compliance method:

If required, the permittee shall determine compliance with this limitation through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

b. Emission limitation:

6.2 tons PM10/Year

Applicable compliance method:

The permittee shall determine compliance with this limitation by using the following calculation:

$(x \text{ tons material processed/year})(0.024 \text{ lb PE/ton material processed})(0.60 \text{ lb PM}_{10}/\text{lb PE})(1 \text{ ton}/2000 \text{ lbs}) = y \text{ tons PM}_{10}/\text{year}$

Where:

x = Tons of material processed in the year

y = annual PM<sub>10</sub> emission rate

g) Miscellaneous Requirements

(1) Sample emissions calculations for fee reporting purposes:

Uncontrolled potential emissions (assume 60% of PE is PM<sub>10</sub>):

$(950 \text{ TPH} * 0.024 \text{ lb of PE/ton of material processed} * 8,760 \text{ hours per year}) / 2,000 \text{ pounds per ton} = 99.9 \text{ tons per year of PE.}$

Controlled emissions using water sprays (80% efficient):

$99.9 \text{ TPY} * (1 - 0.80) = 20 \text{ TPY of PE}$

Controlled emissions with unit operating for 4,500 hours per year

$20 \text{ TPY} * (4,500 \text{ hours} / 8,760 \text{ hours}) = 10.3 \text{ TPY PE and } 6.2 \text{ TPY PM}_{10}$

(2) At the discretion and following the approval of the Director (the appropriate Ohio EPA District Office or local air agency), the permittee may relocate the portable source within the State of Ohio without first obtaining a permit-to-install and operate (PTIO) or a permit-to-install (PTI), providing the appropriate notification and exemption requirements have been met. The Director may issue a "Notice of Site Approval" through either of the following scenarios:

- a. Where future locations of the proposed portable source are unknown, the approval to relocate the portable source shall be acquired in accordance the permanent exemption for portable sources in OAC rule 3745-31-03(A)(1):
  - i. the portable source is operated in compliance with any applicable best available technology (BAT) determination issued in a permit and all applicable state and/or federal rules and laws;
  - ii. the portable source is operating pursuant to a currently effective PTIO or PTI and/or permit to operate (PTO) and continues to comply with the requirements of the permit;
  - iii. the permittee has provided a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation by submitting a "Notice of Intent to Relocate a Portable Source";

- iv. the Ohio EPA district office or local air agency having jurisdiction over the new site has determined that the permitted emissions would not cause a nuisance and would be acceptable under OAC rule 3745-15-07; and
- v. the Director has issued a “Notice of Site Approval”, stating that the proposed site is acceptable and the relocation of the portable source, along with any supporting permitted emissions (e.g. roadways or storage piles), would not result in the installation of a major stationary source or a modification of an existing major stationary source at the new site.

The portable source can be relocated upon receipt of the Director’s “Notice of Site Approval” for the site;

**or**

- b. As the alternative for any pre-disclosed location, the Director may issue a “Notice of Site Approval” if the portable source meets the requirements of OAC rule 3745-31-05(H), as follows:
  - i. the portable source is operating pursuant to a currently effective permit-to-install (PTI), permit-to-install and operate (PTIO), or has been approved for registration status and continues to comply with the requirements of the permit and any applicable state and/or federal rules;
  - ii. the portable source has been issued a PTIO or PTI and the permittee continues to comply with the requirements of the permit, including any applicable best available technology (BAT) determination;
  - iii. the portable source owner has identified and submitted the proposed site to the Ohio EPA prior to the scheduled relocation using the “Notice of Intent to Relocate a Portable Source” form;
  - iv. the permitting District Office/local air agency and the District Office/local air agency having jurisdiction over the new site (if different) have determined that the portable source will have an acceptable environmental impact at the proposed site;
  - v. a public notice, meeting the requirements OAC rule 3745-47, is published in the county where the proposed site is located;
  - vi. the owner of the proposed site (if not the permittee) has provided the portable source owner with approval, or an equivalent declaration, that it is acceptable to move the portable source to the proposed site; and
  - vii. the permittee has provided the Ohio EPA with a minimum of a 15-day written notice of the relocation.

The portable source can be relocated upon receipt of the Director’s “Notice of Site Approval” for the site. Any site approval issued by the Ohio EPA, pursuant to OAC rule 3745-31-05(H), is subject to expiration and renewal. Pursuant to OAC rule 3745-31-07(C)(3), any site approval for a portable source shall be issued for a period of time determined to be appropriate by the Director and the renewal will be reevaluated and subject to the same requirements above.

- (3) If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTIO or PTI (as applicable) for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. 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 rule 3745-77, which may include the requirement to apply for a Title V permit.

- (4) The "Notice of Intent to Relocate a Portable Source" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.