



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

5/10/2013

DAVID BIRD  
CARGILL DEICING TECHNOLOGY  
PO BOX 6920  
CLEVELAND, OH 44101

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1318000397  
Permit Number: P0112948  
Permit Type: OAC Chapter 3745-31 Modification  
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: CDAQ



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
CARGILL DEICING TECHNOLOGY**

Facility ID: 1318000397  
Permit Number: P0112948  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 5/10/2013  
Effective: 5/10/2013  
Expiration: 8/10/2020





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
**CARGILL DEICING TECHNOLOGY**

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. P001, Mix-N-Fines Operation.....	11





## Authorization

Facility ID: 1318000397  
Application Number(s): A0046329  
Permit Number: P0112948  
Permit Description: Chapter 31 PTIO modification affecting the existing Mix-N-Fines operation (emissions unit P001) that will allow the facility to process Mediums, a subset of halite that is currently either bagged as halite or crushed to make CFC. PTI 13-04145 was issued on 6/10/2003 for P001.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$1,250.00  
Issue Date: 5/10/2013  
Effective Date: 5/10/2013  
Expiration Date: 8/10/2020  
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

CARGILL DEICING TECHNOLOGY  
2400 SHIPS CHANNEL  
CLEVELAND, OH 44113

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

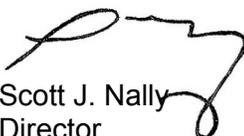
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality  
2nd Floor  
75 Erieview Plaza  
Cleveland, OH 44114  
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



**Final Permit-to-Install and Operate**  
CARGILL DEICING TECHNOLOGY  
**Permit Number:** P0112948  
**Facility ID:** 1318000397  
**Effective Date:** 5/10/2013

## Authorization (continued)

**Permit Number:** P0112948  
**Permit Description:** Chapter 31 PTIO modification affecting the existing Mix-N-Fines operation (emissions unit P001) that will allow the facility to process Mediums, a subset of halite that is currently either bagged as halite or crushed to make CFC. PTI 13-04145 was issued on 6/10/2003 for P001.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	P001
Superseded Permit Number:	13-04145
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
CARGILL DEICING TECHNOLOGY  
**Permit Number:** P0112948  
**Facility ID:** 1318000397  
**Effective Date:** 5/10/2013

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
CARGILL DEICING TECHNOLOGY  
**Permit Number:** P0112948  
**Facility ID:** 1318000397  
**Effective Date:** 5/10/2013

## **B. Facility-Wide Terms and Conditions**



1. 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).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) B.2
2. Emissions unit P001 contained in this permit is subject to 40 CFR Part 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Cleveland Division of Air Quality.

The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart OOO. The permittee shall also comply with all applicable requirements of 40 CFR Part 60, Subpart A (General Provisions) as identified in Table 1 of 40 CFR Part 60, Subpart OOO. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 60, Subpart OOO, and Subpart A.



**Final Permit-to-Install and Operate**  
CARGILL DEICING TECHNOLOGY  
**Permit Number:** P0112948  
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**Effective Date:** 5/10/2013

## **C. Emissions Unit Terms and Conditions**



**1. P001, Mix-N-Fines Operation**

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

Salt processing operation for mix and fines.

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.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	Emissions of fugitive dust shall not exceed: 6.19 tons PM per rolling, 12-month period from dust collector; and 12.1 tons PM per rolling, 12-month period for fugitive dust escaping process equipment.  Best available control measures (see b)(2)b. and b)(2)c. below) that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust from any fugitive dust emission point listed in b)(2)a. below.  The requirements of this rule also include compliance with the requirements of 40



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		CFR Part 60, Subpart OOO.
b.	OAC rule 3745-31-05(F)	PM emissions from the dust collector shall not exceed 0.01 gr/dscf.
b.	OAC rule 3745-17-07 (B)(1)	The visible emissions limitation specified by this rule is less stringent than the visible emissions limitation established pursuant to NSPS Subpart OOO.
c.	OAC rule 3745-17-08(B)	The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-08(B)(3)	The particulate emission limit specified by this rule is less stringent than the particulate emission limit established pursuant to OAC rule 3745-31-05(F).
e.	40 CFR Part 60 Subpart OOO	See b)(2)d. below.
f.	40 CFR Part 60 Subpart A	The permittee shall comply with the applicable provisions of Subpart A as outlined in Table 1 of 40 CFR Part 60 Subpart OOO.

(2) Additional Terms and Conditions

- a. This emissions unit system consists of the following equipment and fugitive dust emission points:
  - i. (1) Gundlach Crusher;
  - ii. (1) Megatex screener;
  - iii. (2) Rotex screeners; and
  - iv. (45) Transfer Points.
- b. The permittee shall employ best available control measures for the mix and fines operation for the purpose of ensuring compliance with the applicable requirements. In accordance with the permittee's permit application, the permittee has committed to enclosing all the conveyor belts and using enclosed chutes between transfer points along the conveyors and elevators within the



process. A dust collector has been installed to capture fugitive emissions from transfer points in the operation process located in the Vacuum Warehouse. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. The installation of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall have a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at the points of capture to the extent possible with good engineering design.
- d. Fugitive emissions escaping from the building openings (except for vents as defined in 40 CFR 60.671) shall not exceed 7 percent opacity as a six-minute average. See Table 3 of 40 CFR 60 Subpart OOO.

The building that contains the NSPS OOO affected facilities (as defined in 60.670 and 60.671) that are a part of emissions unit P001 currently does not have any vents (as defined in 40 CFR 60.671). If vents are installed in the building in the future, they must meet the applicable stack emission limits and compliance requirements in Table 2 of Subpart OOO.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the non-stack egress points (e.g. windows, doors, roof monitors) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

The permittee may, upon receipt of written approval from the Cleveland DAQ, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- (2) The permittee shall maintain monthly records of the amount, in tons, of material throughput for this emissions unit and the rolling, 12-month summation of the material throughput.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term d)(1) above:
  - a. all days during which any visible emissions of fugitive dust were observed from the non-stack egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
  - b. any corrective actions taken to eliminate the visible emissions; and
- (3) The permittee shall submit reports and such other notifications to the CDAQ as are required pursuant to 40 CFR part 60, Subpart OOO, including the following sections:

60.676(a)	equipment replacement in accordance with 60.670(d)
60.676(f)	submittal of written reports for all performance tests
60.676(h)	Subpart A requirement under 60.7(a)(1) is waived
60.676(k)	where to send notifications

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
 6.19 tons of PM per rolling, 12-month period from dust collector
  - Applicable Compliance Method:  
 The annual emission limitation was established as follows:  
 $0.01 \text{ gr/ft}^3 * 16,500 \text{ ft}^3/\text{min} * \text{lb}/7000 \text{ gr} = 1.414 \text{ lb/hr PM from dust collector}$   
 $1.414 \text{ lbs/hr} * 8760 \text{ hrs/yr} * \text{ton}/2000 \text{ lbs} = 6.19 \text{ tpy PM from dust collector}$   
 Therefore, provided compliance is maintained with the gr/cf emission limitation, compliance with the annual emission limitation shall also be demonstrated..



- b. Emission Limitation:  
12.1 tons of PM per rolling, 12-month period of fugitive dust escaping process equipment

Applicable Compliance Method:

Compliance with the actual annual particulate fugitive emission limitation shall be determined using the uncontrolled emission factors for crushing, screening, and material handling operations in AP-42 "Compilation of Air Pollutant Emission Factors", Chapter 11.19.2 (Crushed Stone Processing), Fifth Edition, dated 1/1995. The uncontrolled emission factors are 0.003 lb PM/ton for all transfer points, and 0.025 lb PM/ton for the Megatex screener operation and the Rotex screener operation.

Compliance shall be determined by multiplying the corresponding emission factors by the rolling, 12-month summation of material throughput determined from the recordkeeping requirement in d)(2) for each transfer point in the process and then multiply by (1 – retention factor). Ohio EPA's RACM document provides a retention factor of 0.7 for equipment within a building enclosure (regardless of whether the equipment is an enclosed process), and 0.9 for equipment that is completely enclosed but located outside of a building. The total emissions are the sum of emissions from each transfer point.

- c. Emission Limitation:  
7% opacity as a six-minute average (for fugitive emissions escaping from building openings)

Applicable Compliance Method:

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in 40 CFR 60 Subpart OOO in addition to the following:

- i. The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet); and
- ii. The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed.

Testing shall be done as required by Table 3 of 40 CFR Part 60 Subpart OOO. See f)(2) below. Performance test must be conducted every 5 years.

- d. Emission Limitation:  
PM emissions from the dust collector shall not exceed 0.01 gr/dscf.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be determined in accordance with the US EPA Methods 1 - 5 of 40 CFR Part 60, Appendix A.



- (2) For the NSPS OOO affected facilities that are a part of emissions unit P001, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the modified emissions unit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the NSPS OOO opacity limitation for affected facilities as defined in 60.670 and 60.671.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):  

U.S.EPA Method 9 of 40 CFR Part 60, Appendix A with any additional procedures required by 40 CFR Part 60, Subpart OOO.
  - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Cleveland Division of Air Quality (CDAQ). Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CDAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the CDAQ's refusal to accept the results of the emission test(s).
  - f. Personnel from the CDAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the CDAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CDAQ.



- (3) The permittee shall follow test methods and procedures as are required pursuant to 40 CFR part 60, Subpart OOO, including the following sections:

60.675(a)	performance test reference methods and procedures
60.675(c)	Method 9 additions
60.675(d)	fugitive particulate emissions compliance determination
60.675(e)	alternatives to the reference methods and procedures
60.675(g)	notification for performance tests only involving Method 9
60.675(i)	scheduling of initial performance test

g) Miscellaneous Requirements

- (1) The dust collector referred to in this permit is currently vented indoors and the exhaust emissions are considered as fugitive PM that potentially escapes through the building egress points (e.g., windows, doors, roof monitors, etc.).