



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

9/26/2013

Mike Seabolt
Quaker City Castings
310 EUCLID ST
SALEM, OH 44460

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0215090009
Permit Number: P0115272
Permit Type: Initial Installation
County: Columbiana

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Morning Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO; Pennsylvania; West Virginia



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Quaker City Castings (QCC) is an iron and steel foundry. Metal scrap is melted and poured either into sand molds or into centrifugal mold machines. Castings are finished by grinding, welding, shotblasting, cutting, and/or turning/boring. Sand molds and cores are also made at the facility. This permit is for a new Pangborn double tableblaster (P013).

3. Facility Emissions and Attainment Status:

QCC is located at 310 Euclid St., Salem Ohio, in Columbiana County. The facility is in an attainment area for all criteria pollutants.

QCC is an area source for HAPs and has potential PM10 emissions over 100 tons per year. Compliance with the requirements in the FEPTIO will assure that emissions from QCC stay below 100 tons PM10 per year.

4. Source Emissions:

The FEPTIO includes only the new Pangborn double tableblaster (P013). The emissions from this unit are particulates.

5. Conclusion:

Issue the permit.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	1.95

PUBLIC NOTICE
9/26/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Quaker City Castings
310 EUCLID ST,
SALEM, OH 44460
Columbiana County
FACILITY DESC.: Iron Foundries
PERMIT #: P0115272
PERMIT TYPE: Initial Installation
PERMIT DESC: Initial FEPTIO of a shot blasting operation.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kevin Fortune, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Quaker City Castings**

Facility ID:	0215090009
Permit Number:	P0115272
Permit Type:	Initial Installation
Issued:	9/26/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Quaker City Castings

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	12
1. P013, Double Tableblaster.....	13



Draft Permit-to-Install and Operate

Quaker City Castings

Permit Number: P0115272

Facility ID: 0215090009

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0215090009
Application Number(s): A0048225
Permit Number: P0115272
Permit Description: Initial FEPTIO of a shot blasting operation.
Permit Type: Initial Installation
Permit Fee: \$1,500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/26/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Quaker City Castings
310 EUCLID ST
SALEM, OH 44460

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:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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



Draft Permit-to-Install and Operate

Quaker City Castings

Permit Number: P0115272

Facility ID: 0215090009

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0115272

Permit Description: Initial FEPTIO of a shot blasting operation.

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

Emissions Unit ID:	P013
Company Equipment ID:	Double Tableblaster
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

Quaker City Castings

Permit Number: P0115272

Facility ID: 0215090009

Effective Date: To be entered upon final issuance

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 Ohio EPA DAPC, Northeast District Office 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 submitting¹ 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.

¹Permittees 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.



Draft Permit-to-Install and Operate
Quaker City Castings
Permit Number: P0115272
Facility ID: 0215090009
Effective Date: To be entered upon final issuance

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) Allowable Facility-Wide Emission Limitation:
 - a. The total emissions of particulate matter with a diameter of 10 microns or less (PM₁₀) from all of the air contaminant sources at this facility (except those defined as trivial by Ohio EPA DAPC Engineering Guide 62) shall not exceed 99.5 tons per rolling, 12-month period.
 - (2) Operational Restrictions:
 - a. The maximum throughput of metal melt shall not exceed 17,520 tons per rolling, 12-month period.
 - b. The maximum throughput of virgin sand processing shall not exceed 87,600 tons per rolling, 12-month period.
 - (3) Monitoring and/or Recordkeeping Requirements:
 - a. The permittee shall collect and record the following information each month from all of the air contaminant sources at this facility (except those defined as trivial by Ohio EPA DAPC Engineering Guide 62):
 - i. total metal melt, in tons;
 - ii. rolling, 12-month metal melt;
 - iii. total virgin sand processed, in tons; and
 - iv. rolling, 12-month virgin sand processed.

*The rolling, 12-month value is calculated by adding the current month's value to the sum of the values from the previous eleven months.
 - b. The air contaminant sources at the facility have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.



(4) Reporting Requirements:

- a. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - i. an identification of any month when any of the rolling, 12-month throughput limitations as specified in B.2.a and B.2.b are exceeded; and
 - ii. the actual throughput for the limitation that was exceeded.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

(5) Testing Requirements:

- a. Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1)a of these terms and conditions shall be determined in accordance with the following methods:

- i. Emission Limitation:

The total emissions of PM₁₀ from all of the air contaminant sources at this facility (except those defined as trivial by Ohio EPA DAPC Engineering Guide 62) shall not exceed 99.5 tons per rolling, 12-month period.

- Applicable Compliance Method:

Compliance with the facility-wide PM₁₀ emission limitation of 99.5 tons per rolling, 12-month period is assumed if the throughput limitations in B.1.b)(2) are not exceeded.

- c) The Ohio EPA has determined that Quaker City Castings (QCC) is subject to the requirements of the area source MACT/GACT rule for iron and steel foundries (40 CFR Part 63, Subpart ZZZZZ). Ohio EPA does not have the delegated authority to implement this rule. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with this rule are in effect and are enforceable by U.S. EPA.

Note: Ohio EPA finds that QCC qualifies as a "small foundry" according to the definition in section 63.10880(f) of the area source MACT. This section reads "If the metal melt production for calendar year 2008 is 20,000 tons or less, your area source is a small foundry."



Draft Permit-to-Install and Operate

Quaker City Castings

Permit Number: P0115272

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- d) As of the date of this permit issuance, QCC does not melt more than 600 tons of aluminum per year, and is therefore not subject to the area source MACT for aluminum, copper, and other nonferrous foundries (40 CFR Part 63, Subpart ZZZZZZ). Ohio EPA also does not have the delegated authority to implement this area source MACT. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with this rule are in effect and are enforceable by U.S. EPA.

- e) For more information on the area source rules, please refer to the following U.S. EPA website:
<http://www.epa.gov/ttn/atw/area/arearules.html>



Draft Permit-to-Install and Operate

Quaker City Castings

Permit Number: P0115272

Facility ID: 0215090009

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P013, Double Tableblaster

Operations, Property and/or Equipment Description:

Pangborn Double Tableblaster

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. b)(1)d, c)(1), d)(1), d)(2) and e)(1)

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.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) from this emissions unit shall not exceed 0.45 lb/hr and 1.95 tons/yr. There shall be no visible emissions of fugitive dust emitted from this emissions unit and/or the area immediately above the capture system serving this emissions unit. Visible PE from any stack serving this emissions unit shall not exceed 5% opacity, as a 6-minute average Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)a.] See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-07(B) OAC rule 3745-17-08(B) OAC rule 3745-17-11	The emission limitations and control measure requirements specified by these rules are as stringent or less stringent than the emission limitations and control measure requirements established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-31-05(D)(1)(b)	See B.1.b)(1) and B.1.b)(2) under Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. The permittee shall minimize or eliminate visible PE of fugitive dust by employing best available control measures for this emissions unit for the purpose of ensuring compliance with the above mentioned applicable requirements. These measures shall include, but not be limited to, the following:
 - i. the installation and use of hoods, fans and other equipment to adequately enclose, contain, capture and vent the fugitive dust;
 - ii. the collection efficiency is sufficient to minimize or eliminate visible PE of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and
 - iii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.008 grain of particulate emissions per dry standard cubic foot of exhaust gases.

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

- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.



- c. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this emissions unit since the “controlled” potential to emit is less than ten tons per year.

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to the Double Tableblasterbaghouse at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The acceptable range for the pressure drop across the baghouse, that must be maintained in order to demonstrate compliance with the Facility-Wide emission limitation in section B.1.b)(1)a of this permit, shall be the following:

- a. Double TableblastBaghouse: 1 to 6 inches of water.

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:



- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).



With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If no visible emissions are noted for each daily visible emission check during one month, then the frequency may become weekly. If visible emissions are noted during a weekly inspection, the permittee shall revert to daily visible emission checks until no visible emissions are documented for an entire month, at which time the permittee may again perform checks on a weekly basis.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from this emissions unit and/or the area immediately above the capture system. 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the control device operating parameter limitations that restrict the PE emissions and have been detected by the monitoring and record keeping requirements in this permit, as follows:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;
 - c. the probable cause of each deviation (excursion); and
 - d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (Ohio EPA Northeast District Office).



- (2) 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 PER shall cover a reporting period of no more than 12-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.
- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in d)(3) and d)(4):
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

PE from this emissions unit shall not exceed 0.45 lb/hr and 1.95 tons/yr.

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the baghouse manufacturers specified maximum outlet grain loading of 0.008 gr/dscf by the baghouse design flow rate as shown below:

$$0.008 \text{ gr/dscf} \times 6500 \text{ dscf/min} \times 60 \text{ min/hr} \div 7000 \text{ gr/lb} = 0.45 \text{ lb PE/hr}$$

The ton per year emission limitation was established by multiplying the hourly PE emission limitation by the maximum annual hours of operation, and then converting to tons, as shown below:

$$0.45 \text{ lb PE/hr} \times 8760 \text{ hrs/yr} \div 2000 \text{ lbs/ton} = 1.95 \text{ tons PE/yr}$$

Therefore, if compliance is shown with the hourly emission limitation, compliance shall also be shown with the annual emission limitation



If required, compliance with the particulate emission limitation shall be demonstrated through emissions testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.008 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, compliance with the 0.008 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

There shall be no visible emissions of fugitive dust emitted from this emissions unit and/or the area immediately above the capture system serving this emissions unit.

Applicable Compliance Method:

If required, compliance with the visible emission limitation of fugitive dust shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

d. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emission limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

- (1) None.