



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

Lazarus Gov. Cen  
P.O. Box 10  
Columbus, OH 43216-10

07/29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P001 (Scoring) Scoring of Paper**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006

New NGC Inc

1901 Henderson Drive

Lorain, OH 44052

of a permit to operate for:

P001 (Scoring)

Scoring of Paper

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## General Terms and Conditions

### Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

#### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

#### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

#### 4. 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 the permit. Such records may be maintained in computerized form.

#### 5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## II: Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Scoring operation (Scoring wheels are used to make partial cuts "score marks" into the wallboard paper. These cuts are where the paper will later be folded, creating the edges on the sides of the wallboard panels. This operation is controlled by a 3,580 acfm baghouse. The baghouse also controls equipment associated with the pin mixer (P022), which consists of the recycle conveyor to elevator (E-10) and two screw conveyors.)	OAC rule 3745-35-07	See Sections A.2.a and A.2.b.
	OAC rule 3745-17-07(A)(1)	See Section A.2.c.
	OAC rule 3745-17-11	See Section A.2.c.

### 2. Additional Terms and Conditions

- 2.a All of the particulate emissions from this emissions unit shall be vented to the baghouse. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 0.92 lb/hr. There shall be no visible emissions from the baghouse.
- 2.b Particulate emissions from this emissions unit shall not exceed 4.0 tpy. This is the potential to emit for this emissions unit at 0.92 lb/hr and 8,760 hours/year.
- 2.c The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
2. 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 baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

## Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## E. Testing Requirements

1. Emission Limitation:  
0.92 lb/hr of particulate emissions

**Applicable Compliance Method:**

If required, compliance shall be determined by using the USEPA test methods specified in Section E.4.

2. Emission Limitation:  
4.0 tpy of particulate emissions

**Applicable Compliance Method:**

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
No visible particulate emissions

**Applicable Compliance Method:**

Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

#### Testing Requirements (continued)

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
  - d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while this emissions unit and P022 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

#### F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

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Columbus, OH 43215

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

Mailing Address:

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

07/29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P003 (Rock Dryer) Gypsum Rock Dryer**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006  
New NGC Inc  
1901 Henderson Drive  
Lorain, OH 44052

of a permit to operate for:

P003 (Rock Dryer)  
Gypsum Rock Dryer

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **4. 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 the permit. Such records may be maintained in computerized form.

### **5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## II: Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Rock dryer (This emissions unit is a 15 mmBtu/hr gas fired kiln, with number two fuel oil used as back-up fuel. This operation is used to dry gypsum rock, and is controlled by a 14,500 acfm baghouse.)	OAC rule 3745-35-07	See Sections A.2.a, A.2.b, A.2.c, A.2.d, B.3 and B.4.
	OAC rule 3745-17-07(A)(1)	See Section A.2.e.
	OAC rule 3745-17-11	See Section A.2.e.
	OAC rule 3745-18-06	See Section A.2.e.

### 2. Additional Terms and Conditions

- 2.a All of the particulate emissions from this emissions unit shall be vented to the baghouse. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 3.73 lbs/hr. There shall be no visible emissions from the baghouse.
- 2.b Particulate emissions from this emissions unit shall not exceed 16.3 tpy. This is the potential to emit for this emissions unit at 3.73 lbs/hr and 8,760 hours/year.
- 2.c Sulfur dioxide emissions from this emissions unit shall not exceed 4.56 lbs/hr. Compliance with this hourly emission limitation shall be ensured if the permittee maintains compliance with the sulfur content limitation specified in Section B.3.
- 2.d The total emissions of sulfur dioxide from the following emissions units shall not exceed 95.0 tpy of sulfur dioxide, based upon a rolling, 12-month summation:
- i. P003 - Rock dryer
  - ii. P011 - Board dryer
  - iii. P014 - Calcidyne #1
  - iv. P015 - Calcidyne #2
  - v. P016 - Calcidyne #3
  - vi. P018 - Calcidyne #4

This annual facility sulfur dioxide emission limitation shall be achieved by restricting the maximum quantity of number two fuel oil burned.

- 2.e The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.
2. The permittee shall only burn natural gas and/or number two fuel oil in this emissions unit.  
  
The permittee shall only employ number two fuel with a maximum sulfur content of 0.30 % by weight.
4. The permittee shall limit the total gallons of the number two fuel oil employed in the following emissions units to a maximum of 2,403,755 gallons per year, based upon a rolling 12-month summation:
  - i. P003 - Rock dryer
  - ii. P011 - Board dryer
  - iii. P014 - Calcidyne #1
  - iv. P015 - Calcidyne #2
  - v. P016 - Calcidyne #3
  - vi. P018 - Calcidyne #4

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
2. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall maintain records of the following information for each shipment of oil received for burning in this emissions unit:
  - a. total quantity of oil received; and
  - b. permittee's or oil supplier's analysis for sulfur content.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

4. The permittee shall maintain monthly records of the following information for emissions units P003, P011, P014, P015, P016 and P018, combined:
  - a. total natural gas usage, in mmscf;
  - b. total natural gas usage for the rolling, 12-month period, in mmscf;
  - c. total number two fuel oil usage, in gallons;
  - d. total number two fuel oil usage for the rolling, 12-month period, in gallons;
  - e. SO<sub>2</sub> emissions from the natural gas usage for the rolling, 12-month period, in tons, calculated by multiplying (b) x (0.6 lb/mmscf)/2000, where 0.6 lb/mmscf is an emission factor for the combustion of natural gas (AP-42, Table 1.4-2, July 1998 version);
  - f. SO<sub>2</sub> emissions from the number two fuel oil usage for the rolling, 12-month period, in tons, calculated by multiplying (d) x (142S lb/1000 gal)/2000, where 142S lb/1000 gal is an emission factor for the combustion of number two fuel oil (AP-42, Table 1.3-1, September 1998 version), and S is the average sulfur content of all the fuel oil received for burning during the rolling, 12-month period; and
  - g. total SO<sub>2</sub> emissions for the rolling, 12-month period, in tons, i.e., (e) + (f).

**Monitoring and/or Record Keeping Requirements (continued)**

- i. 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 baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**D. Reporting Requirements**

- 1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
- 2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for SO<sub>2</sub>.
- 4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage limitation for number two fuel oil.
- 5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limitation for the number two fuel.
- 6. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

- 1. Emission Limitation:  
3.73 lbs/hr of particulate emissions  
  
Applicable Compliance Method:  
If required, compliance shall be determined by using the USEPA test methods specified in Section E.6.
- 2. Emission Limitation:  
16.3 tpy of particulate emissions  
  
Applicable Compliance Method:  
As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).
- 3. Emission Limitation:  
No visible particulate emissions  
  
Applicable Compliance Method:  
Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

**Testing Requirements (continued)**

Emission Limitation:  
4.56 lbs/hr of sulfur dioxide emissions

Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by the following equation:

$$E \text{ total (natural gas and number two fuel oil)} = E(1) + E(2)$$

Where:

$E(1) = [A*B]/C$ , sulfur dioxide emission rate while burning natural gas, in pounds per hour

A = emission factor for natural gas, 0.60 lb/mmCF (from AP-42, Table 1.4-2, July 1998 version)

B = burner rated capacity, 15 mmBtu/hr

C = heating value of natural gas, 1,025 Btu/cubic foot

$E(2) = [A/B]*C$ , sulfur dioxide emission rate while burning number two fuel oil, in pounds per hour

A = emission factor for number two fuel oil, 142S lb/1,000 gal (AP-42, Table 1.3-1, September 1998 version)

B = heating value of number two fuel oil, 140,000 Btu/gal (0.14 mmBtu/gal)

C = burner rated capacity, 15 mmBtu/hr

S = maximum, allowable weight percent of sulfur in number two fuel oil, 0.30 %

If required, the permittee shall demonstrate compliance through emission testing conducted in accordance with Methods 1 through 4, and 6 of 40 CFR Part 60, Appendix A.

5. Emission Limitation:  
95.0 tpy of sulfur dioxide emissions, based upon a rolling 12-month summation, for emissions units P003, P011, P014, P015, P016 and P018, combined

Applicable Compliance Method:  
Compliance shall be based upon the monitoring and record keeping requirements specified in Section C.

### Testing Requirements (continued)

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
- d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

### F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Mailing Address:

Lazarus Gov. Cent  
P.O. Box 104  
Columbus, OH 43216-104

Street Address:  
Lazarus Gov. Center  
22 S. Front Street  
Columbus, OH 43215

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

**CERTIFIED MAIL**

RE:

Final Chapter 3745-35 Permit To Operate

P007 (Rock Transfer) Gypsum Rock Transfer

07/29/04

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to

Facility ID: 02-47-08-0006

New NGC Inc

1901 Henderson Drive

Lorain, OH 44052

of a permit to operate for:

P007 (Rock Transfer)

Gypsum Rock Transfer

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office

2110 East Aurora Road

Twinsburg, OH 44087

(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

## **Part I: General Terms and Conditions**

### **Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **4. 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 the permit. Such records may be maintained in computerized form.

### **5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Rock transfer (This operation transfers gypsum rock before and after the rock dryer (P003). Prior to the rock dryer, gypsum rock is conveyed from the rock pile (F001) to the rock dryer by conveyor (B-1), which includes a screen for oversized rock and a return conveyor. Both conveyors and screen are enclosed. After the rock dryer, gypsum rock is transferred by conveyor (SR-1) and elevator (E-1), which are both enclosed. Elevator (E-1) is controlled by a 1,715 acfm baghouse. This baghouse also controls emissions unit (P023).)	OAC rule 3745-35-07	See Sections A.2.a and A.2.b.
	OAC rule 3745-17-07(A)(1)	See Section A.2.c.
	OAC rule 3745-17-11	See Section A.2.c.

## 2. Additional Terms and Conditions

- 2.a All of the particulate emissions from this emissions unit shall be vented to the baghouse. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 0.44 lb/hr. There shall be no visible emissions from the baghouse.
- 2.b Particulate emissions from this emissions unit shall not exceed 1.9 tpy. This is the potential to emit for this emissions unit at 0.44 lb/hr and 8,760 hours/year.
- 2.c The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

## B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

### Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
2. 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 baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### E. Testing Requirements

1. Emission Limitation:  
0.44 lb/hr of particulate emissions  
  
Applicable Compliance Method:  
If required, compliance shall be determined by using the USEPA test methods specified in Section E.4.
2. Emission Limitation:  
1.9 tpy of particulate emissions  
  
Applicable Compliance Method:  
As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).
3. Emission Limitation:  
No visible particulate emissions  
  
Applicable Compliance Method:  
Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

#### **Testing Requirements (continued)**

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
  - d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while this emissions unit and P023 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

#### **F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

et Address:

Mailing Add

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

1/29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P009 (Stucco Storage Silo) Stucco Storage Silo**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006  
New NGC Inc  
1901 Henderson Drive  
Lorain, OH 44052

of a permit to operate for:

P009 (Stucco Storage Silo)  
Stucco Storage Silo

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **4. 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 the permit. Such records may be maintained in computerized form.

### **5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## t II: Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Stucco storage silo, equipped with a 600 acfm baghouse	OAC rule 3745-35-07	See Sections A.2.a and A.2.b.
	OAC rule 3745-17-07(A)(1)	See Section A.2.c.
	OAC rule 3745-17-11	See Section A.2.c.

### 2. Additional Terms and Conditions

- All of the particulate emissions from this emissions unit shall be vented to the baghouse. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 0.15 lb/hr. There shall be no visible emissions from the baghouse.
- Particulate emissions from this emissions unit shall not exceed 0.7 tpy. This is the potential to emit for this emissions unit at 0.15 lb/hr and 8,760 hours/year.
- The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

### C. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
- 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 baghouse 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:
  - the color of the emissions;
  - whether the emissions are representative of normal operations;
  - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.

### D. Reporting Requirements

- The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

## Reporting Requirements (continued)

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## E. Testing Requirements

1. Emission Limitation:  
0.15 lb/hr of particulate emissions

**Applicable Compliance Method:**

If required, compliance shall be determined by using the USEPA test methods specified in Section E.4.

2. Emission Limitation:  
0.7 tpy of particulate emissions

**Applicable Compliance Method:**

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
No visible particulate emissions

**Applicable Compliance Method:**

Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
  - d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

Facility Name: **New NGC Inc**  
Facility ID: **02-47-08-0006**  
Emissions Unit: **Stucco Storage Silo (P009)**

**Testing Requirements (continued)**

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

**Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address

Lazarus Gov. Cen  
P.O. Box 10  
Columbus, OH 43216-10

07/29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P011 (Board Dryer) Drying of Gypsum Board**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006  
New NGC Inc  
1901 Henderson Drive  
Lorain, OH 44052

of a permit to operate for:

P011 (Board Dryer)  
Drying of Gypsum Board

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## Part I: General Terms and Conditions

### Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

### 4. 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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## t II: Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Board dryer (This emissions unit is a 60 mmBtu/hr gas fired dryer, with number two fuel oil used as back-up fuel. This operation is used to dry wallboard panels.)	OAC rule 3745-35-07	See Sections A.2.a, A.2.b, A.2.c, A.2.d, B.2 and B.3.
	OAC rule 3745-17-07(A)(1)	See Section A.2.e.
	OAC rule 3745-17-11	See Section A.2.e.
	OAC rule 3745-18-06	See Section A.2.e.

### 2. Additional Terms and Conditions

- 2.a Particulate emissions from this emission unit shall not exceed 0.86 lb/hr. There shall be no visible emissions from the stacks.
- 2.b Particulate emissions from this emissions unit shall not exceed 3.8 tpy. This is the potential to emit for this emissions unit at 0.86 lb/hr and 8,760 hours/year.
- 2.c Sulfur dioxide emissions from this emissions unit shall not exceed 18.26 lbs/hr. Compliance with this hourly emission limitation shall be ensured if the permittee maintains compliance with the sulfur content limitation specified in Section B.2.
- 2.d The total emissions of sulfur dioxide from the following emissions units shall not exceed 95.0 tpy of sulfur dioxide, based upon a rolling, 12-month summation:
  - i. P003 - Rock dryer
  - ii. P011 - Board dryer
  - iii. P014 - Calcidyne #1
  - iv. P015 - Calcidyne #2
  - v. P016 - Calcidyne #3
  - vi. P018 - Calcidyne #4

This annual facility sulfur dioxide emission limitation shall be achieved by restricting the maximum quantity of number two fuel oil burned.
- 2.e The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

1. The permittee shall only burn natural gas and/or number two fuel oil in this emissions unit.
2. The permittee shall only employ number two fuel with a maximum sulfur content of 0.30 % by weight.

### Operational Restrictions (continued)

The following emissions unit shall limit the No. 2 fuel oil usage at the facility to a maximum of 2,403,755 gallons per year, based on a rolling 12-month summation:

- i. P003 - Rock dryer
- ii. P011 - Board dryer
- iii. P014 - Calcidyne #1
- iv. P015 - Calcidyne #2
- v. P016 - Calcidyne #3
- vi. P018 - Calcidyne #4

### C. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain records of the following information for each shipment of oil received for burning in this emissions unit:
  - a. total quantity of oil received; and
  - b. permittee's or oil supplier's analysis for sulfur content.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

3. The permittee shall maintain monthly records of the following information for emissions units P003, P011, P014, P015, P016 and P018, combined:
  - a. total natural gas usage, in mmscf;
  - b. total natural gas usage for the rolling, 12-month period, in mmscf;
  - c. total number two fuel oil usage, in gallons;
  - d. total number two fuel oil usage for the rolling, 12-month period, in gallons;
  - e. SO<sub>2</sub> emissions from the natural gas usage for the rolling, 12-month period, in tons, calculated by multiplying (b) x (0.6 lb/mmscf)/2000, where 0.6 lb/mmscf is an emission factor for the combustion of natural gas (AP-42, Table 1.4-2, July 1998 version);
  - f. SO<sub>2</sub> emissions from the number two fuel oil usage for the rolling, 12-month period, in tons, calculated by multiplying (d) x (142S lb/1000 gal)/2000, where 142S lb/1000 gal is an emission factor for the combustion of number two fuel oil (AP-42, Table 1.3-1, September 1998 version), and S is the average sulfur content of all the fuel oil received for burning during the rolling, 12-month period; and
  - g. total SO<sub>2</sub> emissions for the rolling, 12-month period, in tons, i.e., (e) + (f).
4. 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(s) 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

## **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for SO<sub>2</sub>.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage limitation for number two fuel oil.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limitation for the number two fuel.
5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## **E. Testing Requirements**

1. Emission Limitation:  
0.86 lb/hr of particulate emissions

**Applicable Compliance Method:**

If required, compliance shall be determined by using the USEPA test methods specified in Section E.6.

2. Emission Limitation:  
3.8 tpy of particulate emissions

**Applicable Compliance Method:**

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
No visible particulate emissions

**Applicable Compliance Method:**

Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

**Testing Requirements (continued)**

4. Emission Limitation:  
18.26 lbs/hr of sulfur dioxide emissions

**Applicable Compliance Method:**

Compliance with the hourly emission limitation shall be determined by the following equation:

$$E \text{ total (natural gas and number two fuel oil)} = E(1) + E(2)$$

**Where:**

$E(1) = [A*B]/C$ , sulfur dioxide emission rate while burning natural gas, in pounds per hour

A = emission factor for natural gas, 0.60 lb/mmCF (from AP-42, Table 1.4-2, July 1998 version)

B = burner rated capacity, 15 mmBtu/hr

C = heating value of natural gas, 1,025 Btu/cubic foot

$E(2) = [A/B]*C$ , sulfur dioxide emission rate while burning number two fuel oil, in pounds per hour

A = emission factor for number two fuel oil, 142S lb/1,000 gal (AP-42, Table 1.3-1, September 1998 version)

B = heating value of number two fuel oil, 140,000 Btu/gal (0.14 mmBtu/gal)

C = burner rated capacity, 15 mmBtu/hr

S = maximum, allowable weight percent of sulfur in number two fuel oil, 0.30 %

If required, the permittee shall demonstrate compliance through emission testing conducted in accordance with Methods 1 through 4, and 6 of 40 CFR Part 60, Appendix A.

5. Emission Limitation:  
95.0 tpy of sulfur dioxide emissions, based upon a rolling 12-month summation, for emissions units P003, P011, P014, P015, P016 and P018, combined

**Applicable Compliance Method:**

Compliance shall be based upon the monitoring and record keeping requirements specified in Section C.

### **Testing Requirements (continued)**

6. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
  - d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

### **F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

Lazarus Gov. Ce  
P.O. Box 1  
Columbus, OH 43216-1

07/29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P012 (Raymond Mill Grinder #1) Gypsum Rock  
Grinding**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006

New NGC Inc

1901 Henderson Drive

Lorain, OH 44052

of a permit to operate for:

P012 (Raymond Mill Grinder #1)

Gypsum Rock Grinding

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office

2110 East Aurora Road

Twinsburg, OH 44087

(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

## Part I: General Terms and Conditions

### Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

### 4. 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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

## Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Raymond Mill grinder #1 (This operation grinds gypsum rock into a flour-like powder called lamplaster. Equipment consist of gypsum rock feed bin #1, Raymond Mill #1, a cyclone (product recovery), lamplaster bin #1, elevator (E-3) and conveyors (S-2, S-3, S-100, S-101 and S-102). In addition, this operation is equipped with an optional bypass ductwork, which allows particulate emissions collected from Raymond Mill #1 to be vented to the baghouse serving Raymond Mill grinder #2 (P013). Raymond Mill #1 is controlled by a 3,240 acfm baghouse.)	OAC rule 3745-35-07	See Sections A.2.a and A.2.b.
	OAC rule 3745-17-07(A)(1)	See Section A.2.c.
	OAC rule 3745-17-11	See Section A.2.c.
	OAC rule 3745-31-05(A)(3) PTI # 19-017	The PTI only required compliance with applicable law at the time the PTI was issued.

### 2. Additional Terms and Conditions

- 2.a All of the particulate emissions from this emissions unit shall be vented to the baghouses. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 0.83 lb/hr. There shall be no visible emissions from the baghouse.
- 2.b Particulate emissions from this emissions unit shall not exceed 3.6 tpy. This is the potential to emit for this emissions unit at 0.83 lb/hr and 8,760 hours/year.
- 2.c The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.
- 2. If the optional bypass ductwork is employed (i.e., venting particulate emissions to the baghouse serving Raymond Mill grinder #2 (P013)), then the permittee also shall comply with Sections B.1, C.1, C.2, D.1 and D.2 for emissions unit P013.

### Monitoring and/or Record Keeping Requirements

The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

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 baghouse 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 emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

### D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### E. Testing Requirements

1. Emission Limitation:  
0.83 lb/hr of particulate emissions  
  
Applicable Compliance Method:  
If required, compliance shall be determined by using the USEPA test methods specified in Section E.4.
2. Emission Limitation:  
3.6 tpy of particulate emissions  
  
Applicable Compliance Method:  
As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).
3. Emission Limitation:  
No visible particulate emissions  
  
Applicable Compliance Method:  
Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

### Testing Requirements (continued)

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
- d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

### F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Address:

15 Gov. Center  
Front Street  
Columbus, OH 43215

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

Mailing Address:

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

1/9/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P013 (Raymond Mill Grinder #2) Gypsum Rock Grinding**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006  
New NGC Inc  
1901 Henderson Drive  
Lorain, OH 44052

of a permit to operate for:

P013 (Raymond Mill Grinder #2)  
Gypsum Rock Grinding

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## I: General Terms and Conditions

### Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

### 4. 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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Raymond Mill grinder #2 (This operation grinds gypsum rock into a flour-like powder called lamplaster. Equipment consist of gypsum rock feed bin #2, Raymond Mill #2, a cyclone (product recovery), lamplaster bin #2 and conveyor (S-103). In addition, this operation is equipped with an optional bypass ductwork, which allows particulate emissions collected from Raymond Mill #2 to be vented to the baghouse serving Raymond Mill grinder #1 (P012)). Raymond Mill #2 is controlled by a 3,240 acfm baghouse.)	OAC rule 3745-35-07	See Sections A.2.a and A.2.b.
	OAC rule 3745-17-07(A)(1)	See Section A.2.c.
	OAC rule 3745-17-11	See Section A.2.c.
	OAC rule 3745-31-05(A)(3) PTI # 19-017	The PTI only required compliance with applicable law at the time the PTI was issued.

### 2. Additional Terms and Conditions

- 2.a All of the particulate emissions from this emissions unit shall be vented to the baghouses. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 0.83 lb/hr. There shall be no visible emissions from the baghouse.
- 2.b Particulate emissions from this emissions unit shall not exceed 3.6 tpy. This is the potential to emit for this emissions unit at 0.83 lb/hr and 8,760 hours/year.
- 2.c The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.
- 2. If the optional bypass ductwork is employed (i.e., venting particulate emissions to the baghouse serving Raymond Mill grinder #1 (P012)), then the permittee also shall comply with Sections B.1, C.1, C.2, D.1 and D.2 for emissions unit P012.

### **Monitoring and/or Record Keeping Requirements**

The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

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 baghouse 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 emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

### **D. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### **E. Testing Requirements**

1. Emission Limitation:  
0.83 lb/hr of particulate emissions  
  
Applicable Compliance Method:  
If required, compliance shall be determined by using the USEPA test methods specified in Section E.4.
2. Emission Limitation:  
3.6 tpy of particulate emissions  
  
Applicable Compliance Method:  
As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).
3. Emission Limitation:  
No visible particulate emissions  
  
Applicable Compliance Method:  
Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

### **ting Requirements (continued)**

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
- d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

### **F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Address:

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

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

Mailing Address:

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

1/29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P014 (Calcidyne System #1) Calcination of Gypsum Ore**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006  
New NGC Inc  
1901 Henderson Drive  
Lorain, OH 44052

of a permit to operate for:

P014 (Calcidyne System #1)  
Calcination of Gypsum Ore

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## General Terms and Conditions

### Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

### 4. 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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

**Special Terms and Conditions**

**Applicable Emissions Limitations and/or Control Requirements**

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Calcidyne system #1 (This emissions unit is a 7 mmBtu/hr natural gas fired system, with number two fuel oil used as back-up fuel. This operation adds heat to the lamplaster to remove water. This operation is controlled by a 4,100 acfm baghouse.)	OAC rule 3745-35-07	See Sections A.2.a, A.2.b, A.2.c, A.2.d, B.3 and B.4.
	OAC rule 3745-17-07(A)(1)	See Section A.2.e.
	OAC rule 3745-17-11	See Section A.2.e.
	OAC rule 3745-18-06	See Section A.2.e.
	OAC rule 3745-31-05(A)(3) PTI # 19-017	The PTI only required compliance with applicable law at the time the PTI was issued.

**2. Additional Terms and Conditions**

**2.a** All of the particulate emissions from this emissions unit shall be vented to the baghouse. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 0.70 lb/hr. There shall be no visible emissions from the baghouse.

Particulate emissions from this emissions unit shall not exceed 3.1 tpy. This is the potential to emit for this emissions unit at 0.70 lb/hr and 8,760 hours/year.

**2.c** Sulfur dioxide emissions from this emissions unit shall not exceed 4.63 lbs/hr. Compliance with this hourly emission limitation shall be ensured if the permittee maintains compliance with the sulfur content limitation specified in Section B.3.

The total emissions of sulfur dioxide from the following emissions units shall not exceed 95.0 tpy of sulfur dioxide, based upon a rolling, 12-month summation:

- i. P003 - Rock dryer
- ii. P011 - Board dryer
- iii. P014 - Calcidyne #1
- iv. P015 - Calcidyne #2
- v. P016 - Calcidyne #3
- vi. P018 - Calcidyne #4

This annual facility sulfur dioxide emission limitation shall be achieved by restricting the maximum quantity of number two fuel oil burned.

**Additional Terms and Conditions (continued)**

1. The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

**Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

2. The permittee shall only burn natural gas and/or number two fuel oil in this emissions unit.
3. The permittee shall only employ number two fuel with a maximum sulfur content of 0.30 % by weight.
4. The permittee shall limit the total gallons of the number two fuel oil employed in the following emissions units to a maximum of 2,403,755 gallons per year, based upon a rolling 12-month summation:
  - i. P003 - Rock dryer
  - ii. P011 - Board dryer
  - iii. P014 - Calcidyne #1
  - iv. P015 - Calcidyne #2
  - v. P016 - Calcidyne #3
  - vi. P018 - Calcidyne #4

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
2. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall maintain records of the following information for each shipment of oil received for burning in this emissions unit:
  - a. total quantity of oil received; and
  - b. permittee's or oil supplier's analysis for sulfur content.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

#### Monitoring and/or Record Keeping Requirements (continued)

The permittee shall maintain monthly records of the following information for emissions units P003, P011 P014, P015, P016 and P018, combined:

- a. total natural gas usage, in mmscf;
  - b. total natural gas usage for the rolling, 12-month period, in mmscf;
  - c. total number two fuel oil usage, in gallons;
  - d. total number two fuel oil usage for the rolling, 12-month period, in gallons;
  - e. SO<sub>2</sub> emissions from the natural gas usage for the rolling, 12-month period, in tons, calculated by multiplying (b) x (0.6 lb/mmscf)/2000, where 0.6 lb/mmscf is an emission factor for the combustion of natural gas (AP-42, Table 1.4-2, July 1998 version);
  - f. SO<sub>2</sub> emissions from the number two fuel oil usage for the rolling, 12-month period, in tons, calculated by multiplying (d) x (142S lb/1000 gal)/2000, where 142S lb/1000 gal is an emission factor for the combustion of number two fuel oil (AP-42, Table 1.3-1, September 1998 version), and S is the average sulfur content of all the fuel oil received for burning during the rolling, 12-month period; and
  - g. total SO<sub>2</sub> emissions for the rolling, 12-month period, in tons, i.e., (e) + (f).
5. 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 baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

#### D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for SO<sub>2</sub>.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage limitation for number two fuel oil.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limitation for the number two fuel.
6. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## Testing Requirements

1. Emission Limitation:  
0.70 lb/hr of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined by using the USEPA test methods specified in Section E.6.

Emission Limitation:

3.1 tpy of particulate emissions

Applicable Compliance Method:

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
No visible particulate emissions

Applicable Compliance Method:

Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

4. Emission Limitation:  
4.63 lbs/hr of sulfur dioxide emissions

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following equation:

$$E \text{ total (Calcidyne + number two fuel oil)} = E(3) + E(4)$$

Where:

E(3) = 2.50 lbs/hr sulfur dioxide emissions (company supplied, process emissions generated by the Calcidyne System) or the average pounds per hour emission rate from the most recent stack test

To demonstrate compliance with the 2.50 lbs/hr emission rate, emission testing was conducted on October 25-26, 1999, using U.S. EPA Method 6, where the average pounds per hour emission rate of sulfur dioxide was 1.29. Emission testing was conducted while burning only natural gas.

E(4) =  $[A/B] \times C$ , sulfur dioxide emission rate while burning number two fuel oil, in pounds per hour

A = emission factor for number two fuel oil, 142S lb/1,000 gal (AP-42, Table 1.3-1, September 1998 version)

B = heating value of number two fuel oil, 140,000 Btu/gal (0.14 mmBtu/gal)

C = burner rated capacity, 7 mmBTU/hr

S = maximum, allowable weight percent of sulfur in number two fuel oil, 0.30 %

If required, the permittee shall demonstrate compliance through emission testing conducted in accordance with Methods 1 through 4, and 6 of 40 CFR Part 60, Appendix A.

5. Emission Limitation:  
95.0 tpy of sulfur dioxide emissions, based upon a rolling 12-month summation, for emissions units P003, P011, P014, P015, P016 and P018, combined

Applicable Compliance Method:

Compliance shall be based upon the monitoring and record keeping requirements specified in Section C.

**Testing Requirements (continued)**

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
- d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

**F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Address:

145 Gov. Center  
Front Street  
Columbus, OH 43215

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

Mailing Address:

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

2/9/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P015 (Calcidyne System #2) Calcination of Gypsum Ore**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006  
New NGC Inc  
1901 Henderson Drive  
Lorain, OH 44052

of a permit to operate for:

P015 (Calcidyne System #2)  
Calcination of Gypsum Ore

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## I: General Terms and Conditions

### Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

### 4. 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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7 Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Calcidyne system #2 (This emissions unit is a 7 mmBtu/hr natural gas fired system, with number two fuel oil used as back-up fuel. This operation adds heat to the lamplaster to remove water. This operation is controlled by a 4,100 acfm baghouse.)	OAC rule 3745-35-07	See Sections A.2.a, A.2.b, A.2.c, A.2.d, B.3 and B.4.
	OAC rule 3745-17-07(A)(1)	See Section A.2.e.
	OAC rule 3745-17-11	See Section A.2.e.
	OAC rule 3745-18-06	See Section A.2.e.
	OAC rule 3745-31-05(A)(3) PTI # 19-017	The PTI only required compliance with applicable law at the time the PTI was issued.

## 2. Additional Terms and Conditions

All of the particulate emissions from this emissions unit shall be vented to the baghouse. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 0.70 lb/hr. There shall be no visible emissions from the baghouse.

- 2.b Particulate emissions from this emissions unit shall not exceed 3.1 tpy. This is the potential to emit for this emissions unit at 0.70 lb/hr and 8,760 hours/year.
- 2.c Sulfur dioxide emissions from this emissions unit shall not exceed 4.63 lbs/hr. Compliance with this hourly emission limitation shall be ensured if the permittee maintains compliance with the sulfur content limitation specified in Section B.3.

The total emissions of sulfur dioxide from the following emissions units shall not exceed 95.0 tpy of sulfur dioxide, based upon a rolling, 12-month summation:

- i. P003 - Rock dryer
- ii. P011 - Board dryer
- iii. P014 - Calcidyne #1
- iv. P015 - Calcidyne #2
- v. P016 - Calcidyne #3
- vi. P018 - Calcidyne #4

This annual facility sulfur dioxide emission limitation shall be achieved by restricting the maximum quantity of number two fuel oil burned.

**Additional Terms and Conditions (continued)**

- 2.e The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

**Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.
2. The permittee shall only burn natural gas and/or number two fuel oil in this emissions unit.
3. The permittee shall only employ number two fuel with a maximum sulfur content of 0.30 % by weight.
4. The permittee shall limit the total gallons of the number two fuel oil employed in the following emissions units to a maximum of 2,403,755 gallons per year, based upon a rolling 12-month summation:
  - i. P003 - Rock dryer
  - ii. P011 - Board dryer
  - iii. P014 - Calcidyne #1
  - iv. P015 - Calcidyne #2
  - v. P016 - Calcidyne #3
  - vi. P018 - Calcidyne #4

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
2. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall maintain records of the following information for each shipment of oil received for burning in this emissions unit:
  - a. total quantity of oil received; and
  - b. permittee's or oil supplier's analysis for sulfur content.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

### Monitoring and/or Record Keeping Requirements (continued)

The permittee shall maintain monthly records of the following information for emissions units P003, P011, P014, P015, P016 and P018, combined:

- a. total natural gas usage, in mmscf;
  - b. total natural gas usage for the rolling, 12-month period, in mmscf;
  - c. total number two fuel oil usage, in gallons;
  - d. total number two fuel oil usage for the rolling, 12-month period, in gallons;
  - e. SO<sub>2</sub> emissions from the natural gas usage for the rolling, 12-month period, in tons, calculated by multiplying (b) x (0.6 lb/mmscf)/2000, where 0.6 lb/mmscf is an emission factor for the combustion of natural gas (AP-42, Table 1.4-2, July 1998 version);
  - f. SO<sub>2</sub> emissions from the number two fuel oil usage for the rolling, 12-month period, in tons, calculated by multiplying (d) x (142S lb/1000 gal)/2000, where 142S lb/1000 gal is an emission factor for the combustion of number two fuel oil (AP-42, Table 1.3-1, September 1998 version), and S is the average sulfur content of all the fuel oil received for burning during the rolling, 12-month period; and
  - g. total SO<sub>2</sub> emissions for the rolling, 12-month period, in tons, i.e., (e) + (f).
5. 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 baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for SO<sub>2</sub>.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage limitation for number two fuel oil.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limitation for the number two fuel.
6. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## g Requirements

Emission Limitation:  
0.70 lb/hr of particulate emissions

Applicable Compliance Method:  
If required, compliance shall be determined by using the USEPA test methods specified in Section E.6.

Emission Limitation:  
3.1 tpy of particulate emissions

Applicable Compliance Method:  
As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
No visible particulate emissions

Applicable Compliance Method:  
Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

4. Emission Limitation:  
4.63 lbs/hr of sulfur dioxide emissions

Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by the following equation:

$$E \text{ total (Calcidyne + number two fuel oil)} = E(3) + E(4)$$

Where:

E(3) = 2.50 lbs/hr sulfur dioxide emissions (company supplied, process emissions generated by the Calcidyne System) or the average pounds per hour emission rate from the most recent stack test

To demonstrate compliance with the 2.50 lbs/hr emission rate, emission testing was conducted on October 25-26, 1999, using U.S. EPA Method 6, where the average pounds per hour emission rate of sulfur dioxide was 0.57. Emission testing was conducted while burning only natural gas.

$E(4) = [A/B]*C$ , sulfur dioxide emission rate while burning number two fuel oil, in pounds per hour

A = emission factor for number two fuel oil, 142S lb/1,000 gal (AP-42, Table 1.3-1, September 1998 version)

B = heating value of number two fuel oil, 140,000 Btu/gal (0.14 mmBtu/gal)

C = burner rated capacity, 7 mmBTU/hr

S = maximum, allowable weight percent of sulfur in number two fuel oil, 0.30 %

If required, the permittee shall demonstrate compliance through emission testing conducted in accordance with Methods 1 through 4, and 6 of 40 CFR Part 60, Appendix A.

5. Emission Limitation:  
95.0 tpy of sulfur dioxide emissions, based upon a rolling 12-month summation, for emissions units P003, P011, P014, P015, P016 and P018, combined

Applicable Compliance Method:  
Compliance shall be based upon the monitoring and record keeping requirements specified in Section C.

**Testing Requirements (continued)**

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
- d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

**F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Address:

Mailing Address:

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

29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P016 (Calcidyne System #3) Calcination of Gypsum Ore**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006  
New NGC Inc  
1901 Henderson Drive  
Lorain, OH 44052

of a permit to operate for:

P016 (Calcidyne System #3)  
Calcination of Gypsum Ore

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## I: General Terms and Conditions

### Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

### 4. 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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7 Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Calcidyne system #3 (This emissions unit is a 7 mmBtu/hr natural gas fired system, with number two fuel oil used as back-up fuel. This operation adds heat to the lamplaster to remove water. This operation is controlled by a 4,100 acfm baghouse.)	OAC rule 3745-35-07	See Sections A.2.a, A.2.b, A.2.c, A.2.d, B.3 and B.4.
	OAC rule 3745-17-07(A)(1)	See Section A.2.e.
	OAC rule 3745-17-11	See Section A.2.e.
	OAC rule 3745-18-06	See Section A.2.e.
	OAC rule 3745-31-05(A)(3) PTI # 19-017	The PTI only required compliance with applicable law at the time the PTI was issued.

## 2. Additional Terms and Conditions

- 2.a** All of the particulate emissions from this emissions unit shall be vented to the baghouse. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 0.70 lb/hr. There shall be no visible emissions from the baghouse.

Particulate emissions from this emissions unit shall not exceed 3.1 tpy. This is the potential to emit for this emissions unit at 0.70 lb/hr and 8,760 hours/year.

Sulfur dioxide emissions from this emissions unit shall not exceed 4.63 lbs/hr. Compliance with this hourly emission limitation shall be ensured if the permittee maintains compliance with the sulfur content limitation specified in Section B.3.

- 2.d** The total emissions of sulfur dioxide from the following emissions units shall not exceed 95.0 tpy of sulfur dioxide, based upon a rolling, 12-month summation:

- i. P003 - Rock dryer
- ii. P011 - Board dryer
- iii. P014 - Calcidyne #1
- iv. P015 - Calcidyne #2
- v. P016 - Calcidyne #3
- vi. P018 - Calcidyne #4

This annual facility sulfur dioxide emission limitation shall be achieved by restricting the maximum quantity of number two fuel oil burned.

**Additional Terms and Conditions (continued)**

- 2.e** The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

**Operational Restrictions**

The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

2. The permittee shall only burn natural gas and/or number two fuel oil in this emissions unit.
3. The permittee shall only employ number two fuel with a maximum sulfur content of 0.30 % by weight.
4. The permittee shall limit the total gallons of the number two fuel oil employed in the following emissions units to a maximum of 2,403,755 gallons per year, based upon a rolling 12-month summation:
  - i. P003 - Rock dryer
  - ii. P011 - Board dryer
  - iii. P014 - Calcidyne #1
  - iv. P015 - Calcidyne #2
  - v. P016 - Calcidyne #3
  - vi. P018 - Calcidyne #4

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
2. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall maintain records of the following information for each shipment of oil received for burning in this emissions unit:
  - a. total quantity of oil received; and
  - b. permittee's or oil supplier's analysis for sulfur content.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

### Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall maintain monthly records of the following information for emissions units P003, P011, P014, P015, P016 and P018, combined:
  - a. total natural gas usage, in mmscf;
  - b. total natural gas usage for the rolling, 12-month period, in mmscf;
  - c. total number two fuel oil usage, in gallons;
  - d. total number two fuel oil usage for the rolling, 12-month period, in gallons;
  - e. SO<sub>2</sub> emissions from the natural gas usage for the rolling, 12-month period, in tons, calculated by multiplying (b) x (0.6 lb/mmscf)/2000, where 0.6 lb/mmscf is an emission factor for the combustion of natural gas (AP-42, Table 1.4-2, July 1998 version);
  - f. SO<sub>2</sub> emissions from the number two fuel oil usage for the rolling, 12-month period, in tons, calculated by multiplying (d) x (142S lb/1000 gal)/2000, where 142S lb/1000 gal is an emission factor for the combustion of number two fuel oil (AP-42, Table 1.3-1, September 1998 version), and S is the average sulfur content of all the fuel oil received for burning during the rolling, 12-month period; and
  - g. total SO<sub>2</sub> emissions for the rolling, 12-month period, in tons, i.e., (e) + (f).
5. 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 baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for SO<sub>2</sub>.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage limitation for number two fuel oil.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limitation for the number two fuel.
6. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## Testing Requirements

Emission Limitation:  
0.70 lb/hr of particulate emissions

Applicable Compliance Method:  
If required, compliance shall be determined by using the USEPA test methods specified in Section E.6.

2. Emission Limitation:  
3.1 tpy of particulate emissions

Applicable Compliance Method:  
As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
No visible particulate emissions

Applicable Compliance Method:  
Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

4. Emission Limitation:  
4.63 lbs/hr of sulfur dioxide emissions

Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by the following equation:

$$E \text{ total (Calcidyne + number two fuel oil)} = E(3) + E(4)$$

Where:

E(3) = 2.50 lbs/hr sulfur dioxide emissions (company supplied, process emissions generated by the Calcidyne System) or the average pounds per hour emission rate from the most recent stack test

E(4) =  $[A/B] \times C$ , sulfur dioxide emission rate while burning number two fuel oil, in pounds per hour

A = emission factor for number two fuel oil, 142S lb/1,000 gal (AP-42, Table 1.3-1, September 1998 version)

B = heating value of number two fuel oil, 140,000 Btu/gal (0.14 mmBtu/gal)

C = burner rated capacity, 7 mmBTU/hr

S = maximum, allowable weight percent of sulfur in number two fuel oil, 0.30 %

If required, the permittee shall demonstrate compliance through emission testing conducted in accordance with Methods 1 through 4, and 6 of 40 CFR Part 60, Appendix A.

5. Emission Limitation:  
95.0 tpy of sulfur dioxide emissions, based upon a rolling 12-month summation, for emissions units P003, P011, P014, P015, P016 and P018, combined

Applicable Compliance Method:  
Compliance shall be based upon the monitoring and record keeping requirements specified in Section C.

### Testing Requirements (continued)

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
- d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

### F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Post Address:

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

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1000  
Columbus, OH 43216-1000

1/29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P017 (Hot Stucco Transfer System) Hot Stucco Material  
Transfer between Calcidyne Units and Hot Stucco silo**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006  
New NGC Inc  
1901 Henderson Drive  
Lorain, OH 44052

of a permit to operate for:

P017 (Hot Stucco Transfer System)  
Hot Stucco Material Transfer between Calcidyne Units and Hot Stucco silo

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## Part I: General Terms and Conditions

### Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

### 4. 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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## t II: Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hot stucco transfer system (This operation transfers hot stucco from the Calcidyne systems to the hot stucco silo (P009). Hot stucco is transferred on a series of 7 conveyors and 1 elevator. Conveyors (S-204 and S-205) are controlled by a 1,600 acfm baghouse. Elevator (E-4) and conveyors (S-10 and S-25) are controlled by a 2,800 acfm baghouse. Conveyor (S-26) is controlled by three 400 acfm baghouses. Conveyor (S-27) is enclosed.)	OAC rule 3745-35-07	See Sections A.2.a and A.2.b.
	OAC rule 3745-17-07(A)(1)	See Section A.2.c.
	OAC rule 3745-17-11	See Section A.2.c.
	OAC rule 3745-31-05(A)(3) PTI # 19-017	The PTI only required compliance with applicable law at the time the PTI was issued.

### 2. Additional Terms and Conditions

- All of the particulate emissions from this emissions unit shall be vented to the baghouses. There shall be no emissions of fugitive dust from this emissions unit. Total particulate emissions from the baghouse stacks shall not exceed 1.00 lb/hr. There shall be no visible emissions from the baghouses.
- Particulate emissions from this emissions unit shall not exceed 4.4 tpy. This is the potential to emit for this emissions unit at 1.00 lb/hr and 8,760 hours/year.
- The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

- The pressure drop across each baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

### C. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on daily basis.

### Monitoring and/or Record Keeping Requirements (continued)

2. 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 each baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across each baghouse did not comply with the allowable range(s) specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouses serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### E. Testing Requirements

1. Emission Limitation:  
1.00 lb/hr of particulate emissions

**Applicable Compliance Method:**

If required, compliance shall be determined by using the USEPA test methods specified in Section E.4.

2. Emission Limitation:  
4.4 tpy of particulate emissions

**Applicable Compliance Method:**

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
No visible particulate emissions

**Applicable Compliance Method:**

Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

**Testing Requirements (continued)**

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
  - d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

**F. Miscellaneous Requirements**

- 1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

Lazarus Gov. Cen  
P.O. Box 10  
Columbus, OH 43216-10

07/29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P018 (Calcidyne System #4) Calcination of Gypsum Ore**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006

New NGC Inc

1901 Henderson Drive

Lorain, OH 44052

of a permit to operate for:

P018 (Calcidyne System #4)

Calcination of Gypsum Ore

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office

2110 East Aurora Road

Twinsburg, OH 44087

(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

## **Part I: General Terms and Conditions**

### **Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **4. 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 the permit. Such records may be maintained in computerized form.

### **5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Calcidyne system #4 (This emissions unit is a 7 mmBtu/hr natural gas fired system, with number two fuel oil used as back-up fuel. This operation adds heat to the lamplaster to remove water. This operation is controlled by a 4,100 acfm baghouse.)	OAC rule 3745-35-07	See Sections A.2.a, A.2.b, A.2.c, A.2.d, B.3 and B.4.
	OAC rule 3745-17-07(A)(1)	See Section A.2.e.
	OAC rule 3745-17-11	See Section A.2.e.
	OAC rule 3745-18-06	See Section A.2.e.
	OAC rule 3745-31-05(A)(3) PTI # 19-017	Particulate emissions shall not exceed an outlet emission rate of greater than 0.02 gr/dscf of exhaust gas from the baghouse.
		Visible particulate emissions from the baghouse stack shall not exceed 7% opacity at any time.

### 2. Additional Terms and Conditions

All of the particulate emissions from this emissions unit shall be vented to the baghouse. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 0.25 lb/hr.

Particulate emissions from this emissions unit shall not exceed 1.11 tpy. This is the potential to emit for this emissions unit at 0.25 lb/hr and 8,760 hours/year.

- 2.c** Sulfur dioxide emissions from this emissions unit shall not exceed 4.63 lbs/hr. Compliance with this hourly emission limitation shall be ensured if the permittee maintains compliance with the sulfur content limitation specified in Section B.3.

### Additional Terms and Conditions (continued)

2.d The total emissions of sulfur dioxide from the following emissions units shall not exceed 95.0 tpy of sulfur dioxide, based upon a rolling, 12-month summation:

- i. P003 - Rock dryer
- ii. P011 - Board dryer
- iii. P014 - Calcidyne #1
- iv. P015 - Calcidyne #2
- v. P016 - Calcidyne #3
- vi. P018 - Calcidyne #4

This annual facility sulfur dioxide emission limitation shall be achieved by restricting the maximum quantity of number two fuel oil burned.

2.e The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.
2. The permittee shall only burn natural gas and/or number two fuel oil in this emissions unit.
3. The permittee shall only employ number two fuel with a maximum sulfur content of 0.30 % by weight.
4. The permittee shall limit the total gallons of the number two fuel oil employed in the following emissions units to a maximum of 2,403,755 gallons per year, based upon a rolling 12-month summation:
  - i. P003 - Rock dryer
  - ii. P011 - Board dryer
  - iii. P014 - Calcidyne #1
  - iv. P015 - Calcidyne #2
  - v. P016 - Calcidyne #3
  - vi. P018 - Calcidyne #4

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
2. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall maintain records of the following information for each shipment of oil received for burning in this emissions unit:
  - a. total quantity of oil received; and
  - b. permittee's or oil supplier's analysis for sulfur content.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content. Alternatively, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

#### **Monitoring and/or Record Keeping Requirements (continued)**

4. The permittee shall maintain monthly records of the following information for emissions units P003, P011 P014, P015, P016 and P018, combined:
  - a. total natural gas usage, in mmscf;
  - b. total natural gas usage for the rolling, 12-month period, in mmscf;
  - c. total number two fuel oil usage, in gallons;
  - d. total number two fuel oil usage for the rolling, 12-month period, in gallons;
  - e. SO<sub>2</sub> emissions from the natural gas usage for the rolling, 12-month period, in tons, calculated by multiplying (b) x (0.6 lb/mmscf)/2000, where 0.6 lb/mmscf is an emission factor for the combustion of natural gas (AP-42, Table 1.4-2, July 1998 version);
  - f. SO<sub>2</sub> emissions from the number two fuel oil usage for the rolling, 12-month period, in tons, calculated by multiplying (d) x (142S lb/1000 gal)/2000, where 142S lb/1000 gal is an emission factor for the combustion of number two fuel oil (AP-42, Table 1.3-1, September 1998 version), and S is the average sulfur content of all the fuel oil received for burning during the rolling, 12-month period; and
  - g. total SO<sub>2</sub> emissions for the rolling, 12-month period, in tons, i.e., (e) + (f).
5. 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 baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for SO<sub>2</sub>.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage limitation for number two fuel oil.
5. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limitation for the number two fuel.
6. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### Testing Requirements

Emission Limitation:  
0.25 lb/hr of particulate emissions

Applicable Compliance Method:  
If required, compliance shall be determined by using the USEPA test methods specified in Section E.6.

Emission Limitation:  
1.11 tpy of particulate emissions

Applicable Compliance Method:  
As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
Visible particulate emissions from the baghouse stack shall not exceed 7% opacity at any time.

Applicable Compliance Method:  
Compliance shall be determined by using Method 9 as outlined in 40 CFR, Part 60, Appendix A, if required by the Ohio EPA.

4. Emission Limitation:  
4.63 lbs/hr of sulfur dioxide emissions

Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by the following equation:

$$E(4) = [A/B] * C, \text{ sulfur dioxide emission rate while burning number two fuel oil, in pounds per hour}$$

Where:

E(3) = 2.50 lbs/hr sulfur dioxide emissions (company supplied, process emissions generated by the Calcidyne System) or the average pounds per hour emission rate from the most recent stack test

E(4) =  $[A/B] * C$ , sulfur dioxide emission rate while burning number two fuel oil, in pounds per hour

A = emission factor for number two fuel oil, 142S lb/1,000 gal (AP-42, Table 1.3-1, September 1998 version)

B = heating value of number two fuel oil, 140,000 Btu/gal (0.14 mmBtu/gal)

C = burner rated capacity, 7 mmBTU/hr

S = maximum, allowable weight percent of sulfur in number two fuel oil, 0.30 %

If required, the permittee shall demonstrate compliance through emission testing conducted in accordance with Methods 1 through 4, and 6 of 40 CFR Part 60, Appendix A.

5. Emission Limitation:  
95.0 tpy of sulfur dioxide emissions, based upon a rolling 12-month summation, for emissions units P003, P011, P014, P015, P016 and P018, combined

Applicable Compliance Method:  
Compliance shall be based upon the monitoring and record keeping requirements specified in Section C.

### Testing Requirements (continued)

- j. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. Visible emissions readings shall be taken throughout each emission test run in accordance with USEPA Method 9.
  - d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

### F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Address:

State Gov. Center  
Front Street  
Columbus, OH 43215

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

Mailing Address

Lazarus Gov.  
P.O. Box  
Columbus, OH 43211

10/19/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P019 (Dry Board Reclaim System) Board Reclaim**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,  
*Michael W. Ahern*

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006  
New NGC Inc  
1901 Henderson Drive  
Lorain, OH 44052

of a permit to operate for:

P019 (Dry Board Reclaim System)  
Board Reclaim

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **1: General Terms and Conditions**

### **Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **4. 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 the permit. Such records may be maintained in computerized form.

### **5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## I: Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Dry board reclaim system (This operation reclaims scrap wallboard from board end trim (B.E.T.) and riser maker operations. Equipment consist of B.E.T. trim saws, two hammer mills, two live bins, six screw conveyors, two elevators and a riser maker. B.E.T. operations are controlled by a 3,300 acfm baghouse and the riser maker operations are controlled by a 4,000 acfm baghouse.)	OAC rule 3745-35-07	See Sections A.2.a and A.2.b.
	OAC rule 3745-17-07(A)(1)	See Section A.2.c.
	OAC rule 3745-17-11	See Section A.2.c.
	OAC rule 3745-31-05(A)(3) PTI # 02-3230	Particulate emissions shall not exceed an outlet emission rate of greater than 0.02 gr/dscf of exhaust gas from the baghouse stacks.
		Visible particulate emissions from the baghouse stack shall not exceed 7% opacity at any time.

### 2. Additional Terms and Conditions

- All of the particulate emissions from this emissions unit shall be vented to the baghouses. There shall be no emissions of fugitive dust from this emissions unit. Total particulate emissions from the baghouse stacks shall not exceed 1.25 lbs/hr.
- Particulate emissions from this emissions unit shall not exceed 5.48 tpy. This is the potential to emit for this emissions unit at 1.25 lbs/hr and 8,760 hours/year.
- The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

- The pressure drop across each baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

### C. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on daily basis.

**Monitoring and/or Record Keeping Requirements (continued)**

2. 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 each baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across each baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouses serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

1. Emission Limitation:  
1.25 lbs/hr of particulate emissions  
  
Applicable Compliance Method:  
If required, compliance shall be determined by using the USEPA test methods specified in Section E.4.
2. Emission Limitation:  
5.48 tpy of particulate emissions  
  
Applicable Compliance Method:  
As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).
3. Emission Limitation:  
Visible particulate emissions from the baghouse stack shall not exceed 7% opacity at any time.  
  
Applicable Compliance Method:  
Compliance shall be determined by using Method 9 as outlined in 40 CFR, Part 60, Appendix A, if required by the Ohio EPA.

### **Testing Requirements (continued)**

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. Visible emissions readings shall be taken throughout each emission test run in accordance with USEPA Method 9.
  - d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

### **F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

07/29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P020 (B-3 Belt and SR-6 Conveyor) B-3 Belt and SR-6  
Conveyor**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006  
New NGC Inc  
1901 Henderson Drive  
Lorain, OH 44052

of a permit to operate for:

P020 (B-3 Belt and SR-6 Conveyor)  
B-3 Belt and SR-6 Conveyor

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

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

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## **Part I: General Terms and Conditions**

### **Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **4. 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 the permit. Such records may be maintained in computerized form.

### **5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## II: Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B-3 belt and SR-6 conveyor (This operation transfers gypsum rock from the rock storage silo (P023) to the Raymond Mills (P012 and P013). This operation is equipped with two baghouses. Conveyor belt (B-3)* is controlled by two 3,845 acfm baghouses. Screw conveyor (SR-6) is controlled by a 3,845 acfm baghouse.)	OAC rule 3745-35-07	See Sections A.2.a and A.2.b.
	OAC rule 3745-17-07(A)(1)	See Section A.2.c
	OAC rule 3745-17-11	See Section A.2.c.

\*(One baghouse is shared by both conveyor belt (B-3) and screw conveyor (SR-6).)

### 2. Additional Terms and Conditions

- All of the particulate emissions from this emissions unit shall be vented to the baghouses. There shall be no emissions of fugitive dust from this emissions unit. Total particulate emissions from the baghouse stacks shall not exceed 2.00 lbs/hr. There shall be no visible emissions from the baghouses.
- Particulate emissions from this emissions unit shall not exceed 8.8 tpy. This is the potential to emit for this emissions unit at 2.00 lbs/hr and 8,760 hours/year.
- The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

- The pressure drop across each baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

### C. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor each pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on daily basis.

### **Monitoring and/or Record Keeping Requirements (continued)**

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 each baghouse 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 emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

### **D. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which pressure drop across each baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouses serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### **E. Testing Requirements**

1. Emission Limitation:  
2.00 lb/hr of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined by using the USEPA test methods specified in Section E.4.

2. Emission Limitation:  
8.8 tpy of particulate emissions

Applicable Compliance Method:

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
No visible particulate emissions

Applicable Compliance Method:

Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

**Testing Requirements (continued)**

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
- d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

**F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Address:

1000 Gov. Center  
1000 Front Street  
Columbus, OH 43215

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

Mailing Address

Lazarus Gov. Center  
P.O. Box 1041  
Columbus, OH 43216-1041

12/29/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P021 (Ball Mill Accelerator Process ) Ball Mill Process**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006

New NGC Inc

1901 Henderson Drive

Lorain, OH 44052

of a permit to operate for:

P021 (Ball Mill Accelerator Process )

Ball Mill Process

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office

2110 East Aurora Road

Twinsburg, OH 44087

(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

## **1: General Terms and Conditions**

### **Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **4. 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 the permit. Such records may be maintained in computerized form.

### **5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Special Terms and Conditions

### Table Emissions Limitations and/or Control Requirements

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Ball mill accelerator process (This process grinds and mixes gypsum rock with starch and land plaster. Equipment consist of a ball mill, a lamplaster bin, a screw conveyor and a starch hopper. The ball mill is controlled by a 600 acfm baghouse, and lamplaster bin is controlled by a 4,685 acfm baghouse.)	OAC rule 3745-35-07	See Sections A.2.a, A.2.b and A.2.c.
	OAC rule 3745-17-07(A)(1)	See Section A.2.d.
	OAC rule 3745-17-11	See Section A.2.d.
	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.
	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See Sections A.2.e and A.2.f.)

## 2. Additional Terms and Conditions

- 2.a Total particulate emissions from the baghouse stacks shall not exceed 1.40 lbs/hr. There shall be no visible emissions from the baghouses.
- 2.b Particulate emissions from this emissions unit shall not exceed 6.1 tpy. This is the potential to emit for this emissions unit at 1.40 lbs/hr and 8,760 hours/year.
- 2.c Fugitive dust emissions from this emissions unit shall not exceed 2.2 tpy.
- 2.d The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.
- 2.e For purposes of verifying compliance with this requirement, the visible emissions of fugitive dust shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.

### Additional Terms and Conditions (continued)

- f. For the ball mixer, lamplaster bin, starch hopper and screw conveyor, the permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). 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; and
  - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

### B. Operational Restrictions

- 1. The pressure drop across each baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

### Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on daily basis.
- 2. 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 the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and 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 emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.

- 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 each baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### D. Reporting Requirements

- 1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across each baghouse did not comply with the allowable range specified above.

### ting Requirements (continued)

The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouses serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### Testing Requirements

1. Emission Limitation:  
1.40 lbs/hr of particulate emissions from the baghouse stacks  
  
Applicable Compliance Method:  
If required, compliance shall be determined by using the USEPA test methods specified in Section E.6.
2. Emission Limitation:  
6.1 tpy of particulate emissions from the baghouse stacks  
  
Applicable Compliance Method:  
As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).
3. Emission Limitation:  
No visible particulate emissions from baghouse stacks  
  
Applicable Compliance Method:  
Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.
4. Emission Limitation:  
2.2 tpy of fugitive particulate emissions  
  
Applicable Compliance Method:  
Compliance shall be determined by using the following equation:  
  
$$E = [A \cdot B (1 - 0.95)] / 2000 \text{ lbs/ton}$$
  
Where:  
E = fugitive particulate emission rate, tpy  
A = particulate emission factor, 37.0 lbs/ton, from AP-42, Fifth edition, Section 11.16 for "Gypsum Manufacturing", 7/93, Table 11.16.2  
B = maximum material charged, 2,410 tpy  
95% = overall capture efficiency for the emissions unit
5. Emission Limitation:  
Visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.  
  
Applicable Compliance Method:  
Compliance with the visible emission limitation for the identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

### **Testing Requirements (continued)**

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates for the baghouses.
- c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
- d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

### **F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Mailing Address:

Lazarus Gov. Center

P.O. Box 1049

Columbus, OH 43216-1049

Street Address:

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

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

07/29/04

**CERTIFIED MAIL**

RE: Final Chapter 3745-35 Permit To Operate

**P022 (Pin Mixer) Pin Mixer**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006

New NGC Inc

1901 Henderson Drive

Lorain, OH 44052

of a permit to operate for:

P022 (Pin Mixer)

Pin Mixer

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office

2110 East Aurora Road

Twinsburg, OH 44087

(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

## I: General Terms and Conditions

### Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

### 4. 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 the permit. Such records may be maintained in computerized form.

### 5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pin mixer (This operation mixes stucco with water and other ingredients to make a slurry. Equipment consist of a pin mixer, vermicalite hopper, pulp mixer, elevator (E-10), recycle conveyor to elevator (E-10) and two screw conveyors. The pin mixer is controlled by a 1,000 acfm baghouse. The recycle conveyor to elevator (E-10) and the two screw conveyors are controlled by 3,580 acfm baghouse. This baghouse also controls emissions unit P001 (scoring operations).)	OAC rule 3745-35-07	See Sections A.2.a and A.2.b.
	OAC rule 3745-17-07(A)(1)	See Section A.2.c.
	OAC rule 3745-17-11	See Section A.2.c.

### 2. Additional Terms and Conditions

- 2.a All of the particulate emissions from this emissions unit shall be vented to the baghouses. There shall be no emissions of fugitive dust from this emissions unit. Total particulate emissions from the baghouse stacks shall not exceed 1.30 lbs/hr. There shall be no visible emissions from the baghouses.
- 2.b Particulate emissions from this emissions unit shall not exceed 5.7 tpy. This is the potential to emit for this emissions unit at 1.30 lbs/hr and 8,760 hours/year.
- 2.c The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

1. The pressure drop across each baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on daily basis.

**Monitoring and/or Record Keeping Requirements (continued)**

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 each baghouse 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 emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across each baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouses serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

1. Emission Limitation:  
1.30 lbs/hr of particulate emissions

**Applicable Compliance Method:**

If required, compliance shall be determined by using the USEPA test methods specified in Section E.4.

2. Emission Limitation:  
5.7 tpy of particulate emissions

**Applicable Compliance Method:**

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
No visible particulate emissions

**Applicable Compliance Method:**

Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

4. 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

### **Testing Requirements (continued)**

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
- d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while this emissions unit and P001 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

### **F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

Address:

Gov. Center  
Front Street  
Columbus, OH 43215

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

Mailing Address:

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

1/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P023 (SR-2 and Rock Storage Silo) Rock Storage**

New NGC Inc (02-47-08-0006)  
Yin-Pong Chang  
2001 Rexford Rd  
Charlotte, NC 28211

Dear Yin-Pong Chang:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 07/29/04

Expiration Date: 07/29/09

This document constitutes issuance to:

Facility ID: 02-47-08-0006

New NGC Inc

1901 Henderson Drive

Lorain, OH 44052

of a permit to operate for:

P023 (SR-2 and Rock Storage Silo)

Rock Storage

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office

2110 East Aurora Road

Twinsburg, OH 44087

(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

## **1. General Terms and Conditions**

### **Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### **2. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **4. 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 the permit. Such records may be maintained in computerized form.

### **5. 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 and federal 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.

### **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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

### **7. Permit Transfers**

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

### **8. 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.

### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

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

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Special Terms and Conditions

### Applicable Emissions Limitations and/or Control Requirements

The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
SR-2 and rock storage silo (This operation transfers gypsum rock by conveyor (SR-2) to the rock storage silo. Conveyor (SR-2) is controlled by a 1715 acfm baghouse. This baghouse also controls elevator (E-1) from emissions unit (P007).)	OAC rule 3745-35-07	See Sections A.2.a and A.2.b.
	OAC rule 3745-17-07(A)(1)	See Section A.2.c.
	OAC rule 3745-17-11	See Section A.2.c.

### 2. Additional Terms and Conditions

- 2.a All of the particulate emissions from this emissions unit shall be vented to the baghouse. There shall be no emissions of fugitive dust from this emissions unit. Particulate emissions from the baghouse shall not exceed 0.44 lb/hr. There shall be no visible emissions from the baghouse.
- 2.b Particulate emissions from this emissions unit shall not exceed 1.9 tpy. This is the potential to emit for this emissions unit at 0.44 lb/hr and 8,760 hours/year.
- 2.c The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07.

### B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water while the emissions unit is in operation.

### C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
- 2. 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 baghouse 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### D. Reporting Requirements

- 1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

### Reporting Requirements (continued)

The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### Testing Requirements

1. Emission Limitation:  
0.44 lb/hr of particulate emissions

**Applicable Compliance Method:**

If required, compliance shall be determined by using the USEPA test methods specified in Section E.4.

2. Emission Limitation:  
1.9 tpy of particulate emissions

**Applicable Compliance Method:**

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 lbs/ton).

3. Emission Limitation:  
No visible particulate emissions

**Applicable Compliance Method:**

Compliance shall be determined by using Method 22 as outlined in 40 CFR, Part 60, Appendix A.

4. 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

### Testing Requirements (continued)

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. Method 22 readings/observations shall be taken throughout each emission test run in accordance with USEPA Method 22.
- d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while this emissions unit and P007 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Ohio EPA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.

### F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.