

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

4/25/2014

Certified Mail

Mr. Michael Marolis  
ARTCO Group International Inc.  
42722 State Route 7  
Hannibal, OH 43931

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0656000063  
Permit Number: P0114368  
Permit Type: Renewal  
County: Monroe

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

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

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-SEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ARTCO Group International Inc.**

|                |            |
|----------------|------------|
| Facility ID:   | 0656000063 |
| Permit Number: | P0114368   |
| Permit Type:   | Renewal    |
| Issued:        | 4/25/2014  |
| Effective:     | 4/25/2014  |
| Expiration:    | 4/25/2024  |





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
ARTCO Group International Inc.

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**Final Permit-to-Install and Operate**  
ARTCO Group International Inc.  
**Permit Number:** P0114368  
**Facility ID:** 0656000063  
**Effective Date:** 4/25/2014

## Authorization

Facility ID: 0656000063  
Application Number(s): A0047490, A0047854  
Permit Number: P0114368  
Permit Description: Renewal PTIO for paved roadways and parking areas and renewal PTIO including administrative changes to correct heat input of P002 as an 18 MMBtu/hr heat treatment furnace with a low NOx burner.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 4/25/2014  
Effective Date: 4/25/2014  
Expiration Date: 4/25/2024  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ARTCO Group International Inc.  
42722 State Route 7  
Hannibal, OH 43931

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

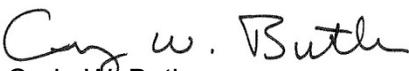
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install and Operate**  
ARTCO Group International Inc.  
**Permit Number:** P0114368  
**Facility ID:** 0656000063  
**Effective Date:** 4/25/2014

## Authorization (continued)

Permit Number: P0114368

Permit Description: Renewal PTIO for paved roadways and parking areas and renewal PTIO including administrative changes to correct heat input of P002 as an 18 MMBtu/hr heat treatment furnace with a low NOx burner.

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

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**F001**

Paved Roads and Parking Areas  
06-08387  
Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**P002**

Heat Treat Furnace  
06-08387  
Not Applicable



**Final Permit-to-Install and Operate**  
ARTCO Group International Inc.  
**Permit Number:** P0114368  
**Facility ID:** 0656000063  
**Effective Date:** 4/25/2014

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



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

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

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

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

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

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

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

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

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

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

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

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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



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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
ARTCO Group International Inc.  
**Permit Number:** P0114368  
**Facility ID:** 0656000063  
**Effective Date:** 4/25/2014

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



**Final Permit-to-Install and Operate**

ARTCO Group International Inc.

**Permit Number:** P0114368

**Facility ID:** 0656000063

**Effective Date:** 4/25/2014

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
ARTCO Group International Inc.  
**Permit Number:** P0114368  
**Facility ID:** 0656000063  
**Effective Date:** 4/25/2014

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



**1. F001, Paved Roads and Parking Areas**

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

Paved roadways and parking areas, with a maximum of 38,544 vehicle miles traveled per year (first operating permit, supersedes PTI 06-08387, issued 4/22/2008).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(a) None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                    | Applicable Emissions Limitations/Control Measures  |
|----|--|--|
| a. | OAC rule 3745-31-05(A)(3), as effective 11/30/01 | Fugitive particulate emissions (PE) shall not exceed 0.93 TPY.<br><br>No visible emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any sixty-minute period.<br><br>Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.<br><br>See b)(2)a. through b)(2)f. below |
| b. | OAC rule 3745-31-05(C), as effective 12/01/06    | See b)(2)g. below.   |



|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures   |
|----|-------------------------------|---|
| c. | OAC rule 3745-17-07(B)(4)     | <p>No visible PE from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.</p> <p>This emission limitation is less stringent than the limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.</p> |
| d. | OAC rule 3745-17-08(B)        | <p>Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.</p> <p>This emission limitation is less stringent than the limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.</p> <p>See b)(2)a. through f. below.</p>   |

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. The permittee shall employ best/reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of chemical stabilization/dust suppressants



and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- g. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install and Operate P0114368 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3):

- i. Treatment of the paved roadways and parking areas with water, flushing, and/or sweeping at sufficient treatment frequencies to minimize or eliminate visible emissions of fugitive dust (95% control efficiency);
- ii. Implementation of speed restrictions to minimize or eliminate emissions of fugitive dust; and
- iii. Fugitive PE shall not exceed 0.93 TPY.

c) Operational Restrictions

- (1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

| <u>paved roadways and parking areas</u> | <u>minimum inspection frequency</u> |
|---|-------------------------------------|
|---|-------------------------------------|

|                             |       |
|-----------------------------|-------|
| all roads and parking areas | daily |
|-----------------------------|-------|

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (3) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Fugitive PE shall not exceed 0.93 TPY.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor calculation for paved roadways and parking areas (AP-42 section 13.2.1, (1/11)) as demonstrated by the following calculations based on information in the permittee's application:

$$EF = ((k (sL/2)^{0.91} * (W)^{1.02})) * (1 - P / (4 * 365))$$

Where:

EF = size-specific emission factor (lb of PE/VMT)

k = particle size multiplier for paved road = 0.011

sL = surface silt loading (g/m<sup>2</sup>) = 9.7

W = mean vehicle weight (tons) = 11.59

P = number of rain days per year >0.01 in. = 140

Therefore, EF = 0.96 lbs of PE/VMT

Maximum travel = 38,544 VMT/year

$$(38,544 \text{ VMT/year})(0.96 \text{ lbs of PE/VMT})(1 \text{ ton}/2,000 \text{ lbs}) = 18.50 \text{ TPY uncontrolled PE}$$

Assume 95% control efficiency for roadway watering (Cleveland SIP Study)

$$(18.50 \text{ TPY}) (0.05) = 0.93 \text{ TPY controlled PE}$$

b. Emissions Limitation:

No visible emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any sixty-minute period.

No visible PE from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.



**Final Permit-to-Install and Operate**

ARTCO Group International Inc.

**Permit Number:** P0114368

**Facility ID:** 0656000063

**Effective Date:** 4/25/2014

Applicable Compliance Method:

If required, visible emissions of fugitive dust shall be determined according to USEPA Method 22, with the modifications found in OAC rule 3745-17-03(B)(4).

g) Miscellaneous Requirements

(1) None.



**2. P002, Heat Treatment Furnace**

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

18-MMBtu/hr natural gas fired heat treatment furnace with a low NOx burner (first operating permit and administrative modification of PTI 06-08387 to correct the fuel input rating of the furnace and BAT requirements).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                           | Applicable Emissions Limitations/Control Measures  |
|----|---|--|
| a. | OAC rule 3745-31-05(A)(3), as effective 11/30/01        | Nitrogen oxide (NOx) emissions shall not exceed 0.067 lb/MMBtu and 5.28 tons/year.<br><br>See b)(2)a. below.                                   |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 | See b)(2)b. below.   |
| c. | OAC rule 3745-17-07(A)                                  | Visible particulate emissions (PE) from any stack shall not exceed twenty percent opacity as a six-minute average, except as provided by rule. |
| d. | OAC rule 3745-17-10(B)(1)                               | PE shall not exceed 0.020 pound per million Btu of actual heat input.  |
| e. | OAC 3745-18-06  | See b)(2)c. below  |



(2) Additional Terms and Conditions

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

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, and PE from this air contaminant source since the uncontrolled potential to emit for NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, and PE is less than 10 tons/yr.

- c. Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from paragraphs (D), (F) and (G) during any calendar day in which natural gas is the only fuel burned.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.



f) Testing Requirements

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

a. Emission Limitations:

NO<sub>x</sub> emissions shall not exceed 0.067 lb/MMBtu and 5.28 tons/year.

Applicable Compliance Method:

The lb/MMBtu emissions limitation for NO<sub>x</sub> is based on emissions testing data of a similar unit, as submitted in the permittee's application.

If required, NO<sub>x</sub> emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual limitation is demonstrated by the following calculation:

$$(0.067 \text{ lb/MMBtu})(18.0 \text{ MMBtu/hr}) (8,760 \text{ hr/yr})/(\text{ton}/2,000 \text{ lb})= 5.28 \text{ tons/year}$$

b. Emission Limitations:

Visible PE from any stack shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, visible emissions of fugitive dust shall be determined according to USEPA Method 22, with the modifications found in OAC rule 3745-17-03(B)(4).

c. Emission Limitations:

PE shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance with the lb/MMBtu emissions limitation is demonstrated by the emissions factor of 0.013 lbs/MMBtu from AP-42 Table 12.5.1-3 (4/09).



**Final Permit-to-Install and Operate**

ARTCO Group International Inc.

**Permit Number:** P0114368

**Facility ID:** 0656000063

**Effective Date:** 4/25/2014

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office, and the procedures specified in OAC rule 3745-17-03(B)(9)

g) Miscellaneous Requirements

(1) None.