

Facility ID: 0829100294 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0829100294 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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.

**A. 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>
Six File Sharpening Machines with wet scrubber	OAC rule 3745-31-05(A)(3) PTI 08-04517	The particulate emissions (PE) from this emissions unit shall not exceed 3.02 pounds per hour (lbs/hr) and 13.21 tons per year (TPY).
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). Visible particulate emissions shall not exceed 20% opacity, as a six minute average.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**
  - (a) The 3.02 lbs/hr limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop hourly record keeping and/or reporting requirements to ensure compliance with the short term limit.

**B. Operational Restrictions**

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than ten (10) inches of water at all times while the emissions unit is in operation.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than six (6) gallons per minute at all times while the emissions unit is in operation.

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

1. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
3. The permittee shall collect and record the following information each day:
  - a. The pressure drop across the scrubber, in inches of water, on an hourly basis.
  - b. The scrubber water flow rate, in gallons per minute, on an hourly basis.
  - c. The operating times for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.
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 serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operation 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 minimize or eliminate any abnormal visible emissions.

If visible emissions are present at greater than 20% opacity, 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 emission unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

5. The permittee shall collect and record the following information each month:

- a. The abrasive used, in pounds
- b. Files sharpened, in pounds (number of files multiplied by 1.1 pounds per file).

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with Section A.1. of the General Terms and Conditions of this permit, and shall include the following information:

- a. All periods of time during which the static pressure drop across the scrubber did not comply with the static pressure drop requirements specified above.
- b. All periods of time during which the scrubber water flow rate did not comply with the water flow rate requirements specified above.
- c. All periods of downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed in excess of the allowable opacity limit specified above from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The permittee shall submit semiannual reports which identify any exceedances of the annual allowable particulate emission limitation, in tons. The reports shall be submitted to RAPCA by January 31 and July 31, of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

1. Compliance with the emissions limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitations -

The particulate emissions from this emissions unit shall not exceed 3.02 pounds per hour.

Applicable Compliance method -

The maximum hourly emission rate is determined by multiplying the maximum hourly rate of abrasive (assuming 50 % is recycled) plus the maximum process weight rate of files (assuming 1% loss) by a scrubber efficiency of 93.9%\* (as determined from the stack test conducted on 01/13/00) (i.e.,  $((67.5 \text{ lbs/hr} * 50\%) + (1570 \text{ lbs/hr} * 1\%)) * (1 - 0.939)$ ).

\* The control efficiency used to calculate emissions is to be based on the control efficiency of the wet scrubber, determined during the most recent stack test.

Emission Limitations -

The particulate emission from this emissions unit shall not exceed 13.21 tons per year.

Applicable Compliance method -

Compliance with the annual emission rate shall be determined as follows:

- i. Multiply the monthly abrasive usage, in pounds, from term C.5.a., by 50% (assuming 50% is recycled)
  - ii. Multiply the monthly files sharpened, in pounds, from term C.5.b., by 1% (assuming a 1% loss from sharpening)
  - iii. Sum i. and ii. above, and multiply by the scrubber efficiency (93.9% as determined from the stack test conducted on 01/13/00) and divide by 2000 lbs/ton  $(((E.1.b.i + E.1.b.ii) * (1 - 0.939)) / 2000)$
- Emission Limitations -  
Visible particulate emissions shall not exceed 20% opacity, as a 6 minute average.

Applicable Compliance method -

If requested, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

**F. Miscellaneous Requirements**

1. None