

Facility ID: 0855140039 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: 0855140039 Emissions Unit ID: P011 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>
P011 - Salt Bath Heat Treat Line M-1433 with baghouse control	OAC rule 3745-31-05(A)(3) PTI 08-1933	The particulate emissions (PE) from this emissions unit shall not exceed 1.76 lbs/hr and 8.0 tons/yr. The visible PE shall not exceed 5% opacity, as a 6 minute average.
	OAC rule 3745-17-07(A)	The organic compound (OC) emissions from this emissions unit shall not exceed 0.8 lb/hour and 3.5 tons/yr.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC 3745-21-07(G)	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**
 - (b) The 1.76 lbs/hr PE and the 0.8 lb/hr OC limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The pressure drop across the baghouse control system shall be maintained within the range of 4 to 7 inches of water when 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 when 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 a daily basis.
2. The permittee shall perform daily checks when the equipment is in operation and when the weather conditions allow for any visible particulate emissions from the stack of 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 emissions incident; and

- e. Any corrective actions taken to minimize or eliminate abnormal 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.

D. Reporting Requirements

1. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any visible particulate emissions were observed and (b) describe the corrective actions taken to minimize or eliminate the visible emissions. The report shall be submitted by January 31 and July 31 of each year to the Director (District Office or Local Air Agency).
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance Method

Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance in accordance with the following methods:

Emission Limitation -
1.76 lbs PE/hour

Applicable Compliance Method-

The 1.76 lbs PE/hour emission limitation was determined from the maximum salt usage process rate multiplied by a site specific emission factor (stack test performed 7/31/1989).

Emission Limitation -

Visible PE emissions shall not exceed 5 percent opacity as a 6-minute average

Applicable Compliance Method-

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

Emission Limitation -

7.71 tons/yr

Applicable Compliance Method-

The 7.71 TPY PE emission limitation was developed by multiplying the hourly emission rate of 1.76 lbs PE/hr by the maximum hourly operating time of 8760 hours/year and dividing by 2,000 lbs/ton. Therefore, if the emissions unit is in compliance with the hourly emission rate, compliance is presumed with the annual emission rate.

Emission Limitation-

0.80 lb/hour OC

Applicable Compliance Method-

The 0.80 lb/hour emissions limitation was determined from emissions testing done on emissions unit P003, which is similar to emissions unit P011.

Emission Limitation-

3.5 tons OC/yr

Applicable Compliance Method-

The 3.5 TPY emission limitation was developed by multiplying the hourly emission rate of 0.80 lb/hr by the maximum hourly operating time of 8760 hours/year and dividing by 2,000 lbs/ton. Therefore, if the emissions unit is in compliance with the hourly emission rate, compliance is presumed with the annual emission rate.

F. Miscellaneous Requirements

1. None