



10/8/2014

Certified Mail

Ms. Jane Neal  
AMG Vanadium, Inc.  
60790 Southgate Road  
Cambridge, OH 43725

Facility ID: 0630010005  
Permit Number: P0105123  
County: Guernsey

RE: DRAFT AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Daily Jeffersonian. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

Erica R. Engel-Ishida, Interim Manager  
Permit Issuance and Data Management Section, DAPC

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



PUBLIC NOTICE  
10/8/2014 Issuance of Draft Air Pollution Title V Permit

AMG Vanadium, Inc.  
60790 Southgate Road,  
Cambridge, OH 43725  
Guernsey County  
FACILITY DESC.: Electrometallurgical Ferroalloy Product Manufacturing  
PERMIT #: P0105123  
PERMIT TYPE: Renewal  
PERMIT DESC: Title V renewal for ferroalloy plant

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Racheal Davies, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501





## Statement of Basis For Air Pollution Title V Permit

Facility ID:	0630010005
Facility Name:	AMG Vanadium, Inc.
Facility Description:	Ferroalloy plant.
Facility Address:	60790 Southgate Road, Cambridge, OH 43725
Permit #:	P0105123, Renewal

This facility is subject to Title V because it is major for:

Lead   
  Sulfur Dioxide   
  Carbon Monoxide   
  Volatile Organic Compounds   
  Nitrogen Oxides  
 Particulate Matter ≤ 10 microns   
 Single Hazardous Air Pollutant   
 Combined Hazardous Air Pollutants  
 Maximum Available Control Technology Standard(s)   
 GHG   
 Title IV

### A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	PTI P0108340, Initial Installation of P020: Multiple Hearth Roaster; PTI Chapter 31 mod, P0116720, issued final 7/18/14, to increase the capacity of P011 to prevent boilovers; PTI Administrative Modification, P0110438, issued final on 10/xx/14 for P014 & P020 alternate CEMS monitoring requirements, P901, and Termination of DFFOs for P014.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	P010 (electric arc furnace), P011 (electric arc furnace), P014 (multiple hearth roaster) and P020 (multiple hearth roaster) are subject to the requirements of CAM for Particulate Emissions (PE). See Emission Unit Specific information in Part C.

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

Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
B.2		40 CFR Part 63, subpart YYYYYY	The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart YYYYYY, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Electric Arc Furnace Steelmaking Facilities. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. P010 and P011 are affected sources at this facility.
B.3	77-07(A)13		Statement of insignificant EUs

**C. Emissions Unit Terms and Conditions**

<b>Key:</b> EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements?		R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement Misc = miscellaneous requirements
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**Statement of Basis**  
 AMG Vanadium, Inc.  
 Permit Number: P0105123  
 Facility ID: 0630010005

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.												
P010	Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08 the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.	17-08(B)		Y	N	N	N	N	N	N	N	N	
P010	PE shall not exceed 33.6 lbs/hr from emissions units P010 and P011 combined.	17-11(B)		N	N	Y	N	Y	Y	Y	N	N	No operation restrictions are required to meet this limit. Emissions testing only if required.
P010	Visible PE from the baghouse stack shall not exceed 20 percent opacity as a six minute average, except as provided by the rule.		40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	N	N	Y	N	Y	Y	Y	N	N	M & R –Perform daily VE using Method 22- like observations and record daily. ET- If VEs observed, conduct a Method 9 test within 24 hours.
P011	PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.	17-07(A)(1)		N	N	Y	N	Y	Y	Y	N	N	No operation restrictions are required to meet this limit. Emissions testing only if required.



**Statement of Basis**  
 AMG Vanadium, Inc.  
 Permit Number: P0105123  
 Facility ID: 0630010005

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P011	Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.	17-07(B)		Y	N	N	N	N	N	N	N	N	
P011	Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08 the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.	17-08(B)		Y	N	N	N	N	N	N	N	N	
P011	PE shall not exceed 33.6 lbs/hr from emissions units P010 and P011 combined.	17-11(B)		N	N	Y	N	Y	Y	Y	N	N	No operation restrictions are required to meet this limit. Emissions testing only if required.
P011	Visible PE from the baghouse stack shall not exceed 20 percent opacity as a six minute average, except as provided by the rule.		40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	N	N	Y	N	Y	Y	Y	N	N	M & R –Perform daily VE using Method 22- like observations and record daily. ET- If VEs observed, conduct a Method 9 test within 24 hours.
P014	PE from the baghouse stack,		OAC rule 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	



**Statement of Basis**  
 AMG Vanadium, Inc.  
**Permit Number:** P0105123  
**Facility ID:** 0630010005

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
	<p>serving the multiple hearth roaster shall be limited to 0.010 gr/dscf of exhaust gases and no visible emissions.</p> <p>PE shall not exceed 10.5 tons per year.</p> <p>NOX emissions shall not exceed 8.9 lbs/hr and 39.0 TPY.</p> <p>OC emissions shall not exceed 8.9 lbs/hr and 39.0 TPY.</p>												
P014	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	17-07(A) 17-11(B)(2)		N	N	N	N	N	N	N	N	N	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P014	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-31-10 through 20.	18-06(E)		N	N	N	N	N	N	N	N	N	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-31-10 through 20.



**Statement of Basis**  
 AMG Vanadium, Inc.  
 Permit Number: P0105123  
 Facility ID: 0630010005

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
P014	CO emissions shall not exceed 78.0 lbs/hr and 341.7 TPY.  SO2 emissions shall not exceed 78.1 lbs/hr and 342.1 TPY.	31-10 through 20	40 CFR 52.21	N	Y	Y	N	Y	Y	Y	N	N	OR- The permittee shall not operate emissions unit P014 above a process weight rate of 80 tons per day.
P014	PE from the toritbaghouse stack serving the truck load-out operations shall not exceed 0.01 lb/hr and 0.01 TPY.  No visible emissions of PE from the toritbaghouse stack serving the truck load-out operations.		OAC rule 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	
P014	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	17-07(A) 17-11(B)(2)		N	N	N	N	N	N	N	N	N	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P014	Visible PE from the baghouse stack shall not		40 CFR Part 64 – Compliance Assurance	N	N	Y	N	Y	Y	Y	N	N	M & R –Perform daily VE using Method 22- like observations and record daily. Also monitor and record differential pressures daily.



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
	exceed 20 percent opacity as a six minute average, except as provided by the rule.		Monitoring (CAM)										ET- If VEs observed, conduct a Method 9 test within 24 hours.
P020	<p>PE shall not exceed 0.010 gr/dscf.</p> <p>NOX emissions shall not exceed 1.04 pound per ton (lbs/ton).</p> <p>VOC emissions shall not exceed 1.99 lbs/ton</p> <p>The requirements of this rule include compliance with the SO2 and CO emissions limitations established pursuant to OAC rule 3745-31-10 through 20.</p>		ORC 3704.03(T)	N	Y	Y	N	Y	Y	Y	N	N	
P020	PM-10/PM-2.5 shall not exceed 0.007 gr/dscf and 8.4 tons per year.		OAC rule 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	
P020	The use of a baghouse with a control efficiency of 99%; and 0.007 gr/dscf and 8.4 TPY of PM-		OAC rule 3745-31-05(E)	Y	N	N	N	N	N	N	N	N	Statement that BAT will go away upon US EPA approval.



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
	10/PM2.5.												
P020	<p>SO2 emissions shall not exceed 78.1 pounds per hour (lbs/hr) and 633 ppmv, as a 3-hour, rolling average.</p> <p>CO emissions shall not exceed 4.72 lbs/ton.</p> <p>The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D).</p>	OAC rules 3745-31-10 through 20		N	Y	Y	N	Y	Y	Y	N	N	
P020	<p>SO2 emissions from emissions units P014 and P020, combined, shall not exceed 342.1 tons, as a 12-month, rolling summation.</p> <p>CO emissions from emissions units P014 and P020, combined, shall not exceed 86.2 tons, as a 12-month, rolling summation.</p>	31-05(D)		N	Y	Y	N	Y	Y	Y	N	N	<p>Synthetic minor to avoid PSD modeling.</p> <p>OR- Combined amount of catalyst processed in P014 and P020 shall be restricted to 36,500 tons per rolling 12-month period.</p> <p>Misc- The permittee shall not operate emissions unit P014 above a process weight rate of 80 tons per day.</p>
P020	Visible PE from the stack serving	17-07(A)		N	N	Y	N	Y	Y	Y	N	N	



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
	this emissions unit shall not exceed 20 per cent opacity as a six-minute average, except as provided by rule.												
P020	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to ORC 3704.03(T).	17-11(B)		N	N	N	N	N	N	N	N	N	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to ORC 3704.03(T).
P020	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 3745-31-10 through 20.	18-06(E)		N	N	N	N	N	N	N	N	N	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 3745-31-10 through 20.
P020	PE from the stack shall not exceed 0.01 lb/hr and 0.01 TPY.  No visible emissions of PE from the toritbagoose stack serving the truck load-out operations.		OAC rule 3745-31-05(A)(3)	N	N	Y	N	Y	Y	Y	N	N	



**Statement of Basis**  
 AMG Vanadium, Inc.  
**Permit Number:** P0105123  
**Facility ID:** 0630010005

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
P020	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	17-07(A) 17-11(B)		N	N	N	N	N	N	N	N	N	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P020	Visible PE from the baghouse stack shall not exceed 20 percent opacity as a six minute average, except as provided by the rule.		40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	N	N	Y	N	Y	Y	Y	N	N	M & R –Perform daily VE using Method 22- like observations and record daily. Also monitor and record differential pressures daily. ET- If VEs observed, conduct a Method 9 test within 24 hours.
P024	PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.	17-07(A)(1)		N	N	Y	N	Y	Y	Y	N	N	No operation restrictions are required to meet this limit. Emissions testing only if required.



**DRAFT**

**Division of Air Pollution Control  
Title V Permit  
for  
AMG Vanadium, Inc.**

Facility ID:	0630010005
Permit Number:	P0105123
Permit Type:	Renewal
Issued:	10/8/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
AMG Vanadium, Inc.

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**Draft Title V Permit**  
AMG Vanadium, Inc.  
**Permit Number:** P0105123  
**Facility ID:** 0630010005

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0630010005  
Facility Description: Ferroalloy plant.  
Application Number(s): A0020561, A0020562, A0040047, A0047018  
Permit Number: P0105123  
Permit Description: Title V renewal for ferroalloy plant  
Permit Type: Renewal  
Issue Date: 10/8/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0089307

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

AMG Vanadium, Inc.  
60790 Southgate Road  
Cambridge, OH 43725

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 a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Title V Permit**  
AMG Vanadium, Inc.  
**Permit Number:** P0105123  
**Facility ID:** 0630010005  
**Effective Date:** To be entered upon final issuance

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



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

## **2. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

- b) 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 all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:



Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Southeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Southeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from



federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Southeast District Office unless otherwise specified.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.



*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

#### **4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

#### **5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

#### **6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

#### **7. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.



- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## **8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## **9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*



## **10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

## **11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## **12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

## **13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Southeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
  - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

#### **15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

#### **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.



This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## **17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## **18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*



**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

**25. Records Retention Requirements Under State Law Only**

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 this permit. Such records may be maintained in computerized form.

**26. 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 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.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

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 units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office 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 the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southeast District Office must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



**30. Submitting Documents Required by this Permit**

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Southeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



**Draft Title V Permit**  
AMG Vanadium, Inc.  
**Permit Number:** P0105123  
**Facility ID:** 0630010005  
**Effective Date:** To be entered upon final issuance

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



Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart YYYYYY, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Electric Arc Furnace Steelmaking Facilities. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.
3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description
P019	Emergency Generator: 150 HP Caterpillar Model XQ-125-3304; PBR 07751 issued 4/19/10.
P021	Reserve Pump – Pump house: 110 HP MN2130 Cummins Model JF6 IP, S/N 55134 PBR 07789 issued 7/11/12 (formerly Z004)
P901	Crusher and material handling operations – PTI P0110438, issued ?/?/2014



**Draft Title V Permit**  
AMG Vanadium, Inc.  
**Permit Number:** P0105123  
**Facility ID:** 0630010005  
**Effective Date:** To be entered upon final issuance

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



1. F002, Roaster Lime Silo

Operations, Property and/or Equipment Description:

Roaster Lime Silo- FGD Hydrated Lime Silo & Lime Day Bin

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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) and PTI 06-05869, 5/23/02	Particulate emissions (PE) shall not exceed 0.010 gr/dscf of exhaust gases or no visible emissions, whichever is less stringent.  PE shall not exceed 0.4 ton per year.  See b)(2)a. below.
b.	OAC rule 3745-17-07(A)(1)	The emissions limitation established pursuant to this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)(2)	The emissions limitation established pursuant to this rule is less stringent than the emissions limitation established pursuant to OAC 3745-31-05 (A)(3).

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on the emissions unit for the purpose of ensuring compliance with the above mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

[Authority for term: OAC rule 3745-31-05(A)(3)]



- b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

[Authority for term: OAC 3745-17-08(A)(1)]

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rules 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions 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 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.

*[Authority for term: OAC rule 3745-77-07(A)(3)(c)]*

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

*[Authority for term: OAC rule 3745-77-07]*

f) Testing Requirements

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

- a. Emission Limitations:

PE shall not exceed 0.010 gr/dscf of exhaust gases or no visible emissions, whichever is less stringent.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR 60 Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(1). No testing is specifically required and compliance will be based upon the monitoring and record keeping in section A.III.

If required, visible particulate emissions shall be determined according to USEPA Method 22.

- b. Emission Limitation

PE shall not exceed 0.4 ton per year.

Applicable Compliance Methods

Compliance shall be based upon the following equation:

$$0.010 \text{ gr/dscf} * 450 \text{ ft}^3/\text{min (per application)} * 60 \text{ min/hr} \div 7,000 \text{ gr/lb} = 0.04 \text{ lb/hr}$$

$$0.04 \text{ lb/hr} * (\text{actual hours of operation}) * 0.0005 \text{ T/lb} = \text{TPY of particulates}$$

g) Miscellaneous Requirements

- (1) None.



**2. F003, Gypsum Silo**

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

Lime Add Silo- FGD Lime Add Silo & Lime Add Surge Hopper

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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) and PTI 06-05869, 5/23/02	Particulate emissions (PE) shall not exceed 0.010 gr/dscf of exhaust gases or no visible emissions, whichever is less stringent.  PE shall not exceed 0.12 ton per year.
b.	OAC rule 3745-17-07(A)(1)	The emissions limitation established pursuant to this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)(2)	The emissions limitation established pursuant to this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on the emissions unit for the purpose of ensuring compliance with the above mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

*[Authority for term: OAC rule 3745-31-05(A)(3)]*

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B),



which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

*Authority for term: [OAC 3745-17-08(A)(1)]*

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

*[Authority for term: OAC rules 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(3)]*

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions 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 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.



*[Authority for term: OAC rule 3745-77-07(A)(3)(c)]*

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

*[Authority for term: OAC rule 3745-77-07]*

f) Testing Requirements

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

- a. Emission Limitations:

PE shall not exceed 0.010 gr/dscf of exhaust gases or no visible emissions, whichever is less stringent.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR 60 Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(1). No testing is specifically required and compliance will be based upon the monitoring and record keeping in section A.III.

If required, visible particulate emissions shall be determined according to USEPA Method 22.

- b. Emission Limitation

PE shall not exceed 0.12 ton per year.

Applicable Compliance Methods

Compliance shall be based upon the following equation:

$$0.010 \text{ gr/dscf} * 150 \text{ ft}^3/\text{min} \text{ (per application)} * 60 \text{ min/hr} \div 7,000 \text{ gr/lb} = 0.013 \text{ lb/hr}$$

$$0.013 \text{ lb/hr} * \text{(actual hours of operation)} * 0.0005 \text{ T/lb} = \text{TPY of particulates}$$

g) Miscellaneous Requirements

- (1) None.



3. P002, V2O5 Dump Hopper

Operations, Property and/or Equipment Description:

Silo for raw material handling and mix preparation controlled with a baghouse with 99% capture efficiency and 90% control efficiency. (installed in 1953 no PTI)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(A)(1)	Visible particulate emissions (PE) from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.
b.	OAC rule 3745-17-11(B)(2)	Particulate Emissions (PE) shall not exceed 0.48 lb/hr for emissions unit P002.

(2) Additional Terms and Conditions

a. Except as provided in OAC rule 3745-17-07(A)(3), visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except:

i. visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes; but

ii. shall not exceed 60 percent opacity, as a six-minute average, at any time; and

iii. the presence of uncombined water shall not be deemed a violation for failure of stack emissions meeting this requirement.

Authority for term: [OAC rule 3745-17-07(A)(1) and (2)]

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which



requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

Authority for term: [OAC 3745-17-08(A)(1)]

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) 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 and 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 emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

*[Authority for term: [OAC rules 3745-17-07(A) and (B), and OAC rule 3745-77-07(A)(3)]]*

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions 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 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.

*[Authority for term: OAC rule 3745-77-07(A)(3)(c)]*

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

*[Authority for term: OAC rule 3745-77-07]*

f) Testing Requirements

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

a. Emissions Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

b. Emissions Limitation:

Particulate Emissions (PE) shall not exceed 0.48 lb/hr for emissions unit P002.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.



4. P007, Primary and Secondary Crusher

Operations, Property and/or Equipment Description:

Primary and secondary crushing and screening operations controlled by a baghouse with 100% capture efficiency and 90% control efficiency. (installed in 1953, therefore no PTI)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(A)(1)	Visible particulate emissions (PE) from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.
b.	OAC rule 3745-17-11(B)(2)	Particulate Emissions (PE) shall not exceed 0.07 lb/hr for emissions unit P007.

(2) Additional Terms and Conditions

a. Except as provided in OAC rule 3745-17-07(A)(3), visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except:

i. visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes; but

ii. shall not exceed 60 percent opacity, as a six-minute average, at any time; and

iii. the presence of uncombined water shall not be deemed a violation for failure of stack emissions meeting this requirement.

Authority for term: [OAC rule 3745-17-07(A)(1) and (2)]

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which



requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

Authority for term: [OAC 3745-17-08(A)(1)]

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

*[Authority for term: OAC rules 3745-17-07(A), and OAC rule 3745-77-07(A)(3)]*

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions 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 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.



*[Authority for term: OAC rule 3745-77-07(a)(3)(c)]*

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

*[Authority for term: OAC rule 3745-77-07]*

f) Testing Requirements

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

a. Emissions Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

b. Emissions Limitation:

Particulate Emissions (PE) shall not exceed 0.07 lb/hr for emissions unit P007.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.



**5. P010, Furnace #2**

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

Electric arc melting furnace

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-07(B)	See b)(2)a. below.
c.	OAC rule 3745-17-08(B)	See b)(2)b. below.
d.	OAC rule 3745-17-11(B)	PE shall not exceed 33.6 lbs/hr from emissions units P010 and P011 combined.
e.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) and d)(2).

(2) Additional Terms and Conditions

a. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

b. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08 the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, while the equipment is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit and any visible fugitive particulate emissions. 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.

*[Authority for term: OAC rules 3745-17-07(A), 40 CFR Part 64, and OAC rule 3745-77-07(A)(3)]*

- (2) The CAM plan for this emissions unit is based on the use of visible emission observations as an indicator of baghouse performance. For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack, regardless of whether it exceeds the 20% opacity standard. The observer will be familiar with Method 22-like procedures. The Method 9 observer will be familiar with Method 9 procedures and will be certified.

Authority for term: [40 CFR Part 64 and OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible stack and/or abnormal fugitive particulate emissions 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 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.

*[Authority for term: OAC rule 3745-77-07]*

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

*[Authority for term: OAC rule 3745-77-07]*



f) Testing Requirements

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

a. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

PE shall not exceed 33.6 lbs/hr from emissions units P010 and P011 combined.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(2) 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 permit issuance 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. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 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.

d. The test(s) shall be conducted while this emissions unit and emissions unit P011 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

Personnel from the appropriate Ohio EPA District Office or local air agency 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

- g) Miscellaneous Requirements
  - (1) None.



**6. P011, Furnace #1**

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

Electric Arc Melting Furnace with maximum hourly throughput of 65,500 lb/hr and a maximum annual throughput of 41,967.63 TPY controlled by a baghouse with 100% capture and 99% control

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) 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 11/30/2001	Install a baghouse designed to meet 100% capture and 99% control for particulate emissions (PE), PM <sub>10</sub> and PM <sub>2.5</sub> .  See b)(2)a.
b.	OAC rule 3745-31-05(C), as effective 12-01/2006	See b)(2)b.
c.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 8.12 tons per month, averaged over a rolling, 12-month period.  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 1.19 tons per month, averaged over a rolling, 12-month period.  Carbon monoxide (CO) emissions shall not exceed 4.83 tons per month, averaged over a rolling, 12-month period.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	PE shall not exceed 75 lb/hr.
e.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 253.43 lb/hr.
f.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(2) and d)(3).

(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.

*[Authority for term: [OAC rule 3745-31-05(A)(3)]*

- 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.

Permit-to-install and operate P0116720 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 BAT requirements under OAC rule 3745-31-05(A)(3):

- i. Install a baghouse with 100% capture and 99% control for PE, PM<sub>10</sub> and PM<sub>2.5</sub>.
- ii. Maximum annual throughput of 41,967.63 tons/year.
- iii. PE/PM<sub>10</sub>/PM<sub>2.5</sub> shall not exceed 8.60 / 6.30 / 4.62 tons/year respectively.

*Authority for term: [OAC rule 3745-31-05(C)]*

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Maintaining the Baghouse

- a. Baghouse Maintenance Plan



The owner/operator shall develop and implement a baghouse maintenance plan designed to ensure that the baghouse continues to operate as designed. This Baghouse Maintenance Plan can either be developed in-house or can be developed by the manufacturer of the baghouse. This Baghouse Maintenance Plan shall include, at a minimum, the following elements:

- i. The frequency of inspection of the baghouse for maintenance purposes;
- ii. A description of the baghouse components to be inspected at each inspection. It is acceptable to have different inspection frequencies for different baghouse components;
- iii. A description of any procedures to be used to verify the proper operation of any of the baghouse components to be inspected at each inspection;
- iv. The identification of the record keeping form/record that will be used to track the maintenance inspection. This form/record should include, at a minimum, the following elements:
  - (a) Date of the maintenance inspection
  - (b) Name of the employee who can verify that the inspection was completed;
  - (c) Result of the inspection (component repaired, in need of repair, replaced, adjusted, no adjustment needed, etc.);
  - (d) Date component repaired, replaced or adjusted;
  - (e) Name of the employee who can verify that the component was repaired, replaced or adjusted;
- v. A description of how and where the records shall be maintained.

The permittee shall begin using the Baghouse Maintenance Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Baghouse Maintenance Plan. The permittee shall submit a copy of proposed revisions to the Baghouse Maintenance Plan to the appropriate District Office or local air agency (DO/LAA) for review and approval. The permittee can begin using the revised Baghouse Maintenance Plan once the appropriate DO/LAA has approved its use.

*[Authority for term: [OAC rules 3745-31-05(A)(3) and 3745-31-05(D)]*

b. Baghouse Maintenance Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the baghouse components at frequencies described in the Baghouse Maintenance Plan. The purpose of the inspections is to determine the need for maintenance on components of the baghouse. Inspections may be delayed in the case of unsafe working conditions due to weather etc. Any



required inspection that is not performed due to unsafe working conditions shall be performed as soon as practical after the working conditions are considered safe.

*Authority for term: [OAC rules 3745-31-05(A)(3) and 3745-31-05(C)]*

c. Baghouse Maintenance Plan Record Keeping

The permittee shall maintain records of the following information:

- i. The records required to be collected under the Baghouse Maintenance Plan, and
- ii. The date and reason any element of the Baghouse Maintenance Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part I of this permit.

*Authority for term: [OAC rules 3745-31-05(A)(3) and 3745-31-05(C)]*

- (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 stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

*[Authority for term: OAC rule 3745-17-07(A), and 40 CFR Part 64]*



- (3) The CAM plan for this emissions unit is based on the use of visible emission observations as an indicator of baghouse performance. For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack, regardless of whether it exceeds the 20% opacity standard. The observer will be familiar with Method 22-like procedures. The Method 9 observer will be familiar with Method 9 procedures and will be certified.

Authority for term: [40 CFR Part 64 and OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the 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.

*[Authority for term: OAC rule 3745-17-07(A)]*

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emissions Limitation:  
  
Install a baghouse designed to meet 100% capture and 99% control for PE, PM<sub>10</sub> and PM<sub>2.5</sub>.  
  
Applicable Compliance Method:  
  
Compliance with this design efficiency shall be determined by the manufacturer specifications for the baghouse.  
  
If required, PE 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.



b. Emissions Limitation:

SO<sub>2</sub> emissions shall not exceed 8.12 tons per month, averaged over a rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emissions limitation may be determined in accordance with the following equation:

$$\text{(SO}_2\text{ emissions factor from the most recent stack test (lb/ton))} \times \text{(maximum throughput of P011 (41,967.63 tons/year as submitted in permittee's application))} / \text{(2,000 lbs/ton)}$$

SO<sub>2</sub> emissions shall be determined according to test Methods 1 - 4, and 6 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. See f)(2) below.

c. Emissions Limitation:

NO<sub>x</sub> emissions shall not exceed 1.19 tons per month, averaged over a rolling, 12-month period.

Applicable Compliance Method:

$$\text{(NO}_x\text{ emissions factor from the most recent stack test (lb/ton))} \times \text{(maximum throughput of P011 (41,967.63 tons/year as submitted in permittee's application))} / \text{(2,000 lbs/ton)}$$

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. See f)(2) below.

d. Emissions Limitation:

CO emissions shall not exceed 4.83 tons per month, averaged over a rolling, 12-month period.

Applicable Compliance Method:

$$\text{(CO Emissions factor from the most recent stack test (lb/ton))} \times \text{(maximum throughput of P011 (41,967.63 tons/year as submitted in permittee's application))} / \text{(2,000 lbs/ton)}$$

CO emissions shall be determined according to test Methods 1 - 4, and 10 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. See f)(2) below.

e. Emissions Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Visible particulate emissions shall be determined according to USEPA Method 9. See f)(2) below.

f. Emissions Limitation:

PE shall not exceed 75lb/hr.

Applicable Compliance Method:

This emissions limitation was established using Curve P-2 of Figure 2 to the appendix of OAC rule 3745-17-11 and an uncontrolled mass emissions rate of 1,065lb/hr.

PE 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. See f)(2) below.

g. Emissions Limitation:

SO<sub>2</sub> emissions shall not exceed 256.43 lb/hr.

Applicable Compliance Method:

This emissions limitation was established using the following equation found in OAC rule 3745-18-06(E)(2) and a maximum process weight rate of 24.593 tons per hour:

$$\text{AER} = 30P^{0.67}$$

Where

AER = the allowable emissions rate in lbs of SO<sub>2</sub> per hour

P = the process weight rate in tons per hour

SO<sub>2</sub> emissions shall be determined according to test Methods 1 - 4, and 6 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. See f)(2) below.

h. Emissions Limitation:

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.

Permit-to-install and operate P0116720 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 BAT requirements under OAC rule 3745-31-05(A)(3):

- i. Install a baghouse with 100% capture and 99% control for PE, PM<sub>10</sub> and PM<sub>2.5</sub>.
- ii. PE shall not exceed 8.59 TPY; PM<sub>10</sub> shall not exceed 6.28 TPY; and PM<sub>2.5</sub> shall not exceed 4.61 TPY.

Applicable Compliance Method:

Compliance shall be demonstrated through by the most recent stack test and the baghouse maintenance records as required in d)(1) above.

(2) The permittee shall conduct, or have conducted, emission testing for the dry particulate control device for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the emissions limitations in f)(1)a. through f)(1)g. above.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE, Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources"

PM<sub>10</sub>, Method 201A found in 40 CFR Part 51, Appendix M

Visible PE, USEPA Method 9

SO<sub>2</sub>, Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources"

NO<sub>x</sub>, 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"



CO, Methods 1 - 4, and 10 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 the Ohio EPA.

- d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- h. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.



**7. P014, Multiple Hearth Roaster #1**

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

Multiple Hearth Roaster #1: 80 ton per day natural gas/propane-fired multiple hearth roaster #1 controlled by dry scrubber (96.1% control efficiency for SO<sub>2</sub>) and baghouse (99% control efficiency for PE) and associated truck load-out operation controlled with a toritbaghouse (99.9% control for PE)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) d)(4) and d)(5)
- 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
<b>Multiple Hearth Roaster #1</b>		
a.	OAC rule 3745-31-05(A)(3) and PTI 06-05869, 5/23/02	Particulate emissions (PE) from the baghouse stack, serving the multiple hearth roaster shall be limited to 0.010 gr/dscf of exhaust gases and no visible emissions.  PE shall not exceed 10.5 tons per year.  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 8.9 lbs/hr and 39.0 TPY.  Organic compounds (OC) emissions shall not exceed 8.9 lbs/hr and 39.0 TPY.
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(B)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06(E)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-31-10 through 20.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR 52.21 and OAC rules 3745-31-10 through 20	Carbon monoxide (CO) emissions shall not exceed 78.0 lbs/hr and 341.7 TPY.  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 78.1 lbs/hr and 342.1 TPY.
<b>Multiple Hearth Roaster # 1 Load-Out</b>		
f.	OAC rule 3745-31-05(A)(3)	PE from the toritbaghouse stack serving the truck load-out operations shall not exceed 0.01 lb/hr and 0.01 TPY.  No visible emissions of PE from the toritbaghouse stack serving the truck load-out operations.
g.	OAC rule 3745-17-07(A)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-17-11(B)(2)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(3), d)(4), and d)(5).

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on the Multiple Hearth Roaster#1 for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee shall install and maintain enclosures and vent emissions to a dry scrubber and a baghouse which is capable of meeting the applicable requirements to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

*[Authority for term: OAC rule 3745-31-05(A)(3)]*

b. Prior to the installation of the continuous SO<sub>2</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site(s) in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.

*[Authority for term: 40 CFR 52.21 and OAC rules 3745-31-01 through 20]*

c. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous SO<sub>2</sub> monitoring



system designed to ensure continuous valid and representative readings of SO<sub>2</sub>. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous SO<sub>2</sub> monitoring system must be kept on site and available for inspection during regular office hours.

*(Authority for term: 40 CFR 52.21 and OAC rules 3745-31-01 through 20)*

- d. The control equipment specified for this emissions unit is the same control equipment used to control emissions from emissions unit P014. To ensure compliance with the emission limitations in this permit, the permittee is prohibited from operating emissions units P014 and P020 concurrently, except during periods of operational transition between multiple hearth roasters.

*Authority for term: [OAC rule 3745-31-05(A)(3), 40 CFR 52.21 and OAC rules 3745-31-01 through 20]*

c) Operational Restrictions

- (1) The pressure drop across the baghouse shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.

*Authority for term: [OAC rule 3745-31-05(A)(3)]*

- (2) The permittee shall not operate emissions unit P014 above a process weight rate of 80 tons per day.

*Authority for term: [OAC rule 3745-77-07(A)(3)]*

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub> monitoring system including, but not limited to, parts per million SO<sub>2</sub> on a fifteen minute average basis, emissions of SO<sub>2</sub> in units of the applicable standard in the appropriate averaging period (e.g., hourly, hourly rolling, 3-hour, daily, 30-day rolling, etc.), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

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 this permit. Such records may be maintained in computerized form.

*Authority for term: [40 CFR 52.21 and OAC rules 3745-31-01 through 20]*



- (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 roaster stack and 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 emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item "d." above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

*Authority for term: [OAC rules 3745-17-07(A) and OAC rule 3745-77-07(A)(3)]*

- (3) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the toritbaghouse stack serving the truck load-out operations of 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. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

*Authority for term: [OAC rule 3745-31-05(A)(3), and 40 CFR Part 64]*

- (4) The CAM plan for this emissions unit is based on the use of visible emission observations as an indicator of baghouse performance. For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack, regardless of whether it exceeds the 20% opacity standard. The observer will be familiar with Method 22-like procedures. The Method 9 observer will be familiar with Method 9 procedures and will be certified.



Authority for term: [40 CFR Part 64 and OAC rule 3745-77-07(A)(3)]

- (5) The permittee shall monitor and record the differential pressures daily, while the emissions unit is in operation.

Authority for term: [40 CFR Part 64]

- (6) The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and,
  - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

- (7) This permit allows the use of materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 754,000

Maximum Hourly Emission Rate (lbs/hr): 0.26

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0737

MAGLC (ug/m3): 18,000

Pollutant: Sulfuric Acid

TLV (ug/m3): 1,000

Maximum Hourly Emission Rate (lbs/hr): 0.96

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.72

MAGLC (ug/m3): 23.8



Effective Date: To be entered upon final issuance

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- d. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- e. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- f. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

- (8) In the event that the CEMS breaks down in such a manner that a certified CEMS is unobtainable, the permittee shall maintain records of the hourly SO<sub>2</sub> emissions, in pounds per hour, calculated from sulfur content of the feed, determined using a LECO sulfur analyzer which employs a combustion-infrared absorption method, and the catalyst feed rate and as follows:

$$SO_2 \text{ emissions } \left( \frac{lbs}{hr} \right) = \text{sulfur content of feed } (\%) * \text{hourly feed rate } \left( \frac{tons}{hr} \right) * 2,000 \frac{lbs}{ton} * (1 - \text{control efficiency})$$

This requirement does not eliminate the requirement to comply with 40 CFR 52.21 and OAC rules 3745-31-10 through 20.



*Authority for term: [OAC rules 3745-31-10 through 20]*

- (9) The permittee shall record on a daily basis the PWR, in tons per day, of material input into the roaster of emissions unit P014 when it is in operation.

*Authority for term: [OAC rule 3745-77-07(A)(3)]*

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports which identify each day that the observations required under the monitoring section of this permit were not performed and each day that any corrective measures required to be taken pursuant to the monitoring section of this permit were not performed.

*Authority for term: [OAC rule 3745-77-07]*

- (2) Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(l) and 3704.031 and 40 CFR Parts 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting the date, commencement and completion times, duration magnitude, reason (if known), and corrective action taken (if any), of all instances of SO<sub>2</sub> values in excess of the applicable limits specified in OAC Chapter 3745-18, in units of the applicable standard(s). These reports shall also contain the total SO<sub>2</sub> emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting any continuous SO<sub>2</sub> monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.



*Authority for term: [OAC rule 3745-77-07, OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(l) and 3704.031, and 40 CFR Parts 60.13(h)]*

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible stack particulate emissions 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 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.

*Authority for term: [OAC rule 3745-31-05 and OAC rule 3745-77-07]*

- (4) In the event that the CEMS breaks down in such a manner that a certified CEMS is unobtainable, the permittee shall immediately notify the Ohio EPA. If the CEMS remains uncertified for more than seventy-two hours, the permittee shall provide a written statement to the director within two weeks of the date of the malfunction. The immediate notification and written statement shall include the following:
- a. Identification and location of such equipment including the OEPA permit number for each contaminant source;
  - b. The estimated or actual duration of the operation of the emissions unit in the absence of a certified CEMS;
  - c. Statements demonstrating that
    - i. Shutdown of source operation, during the period of time in absence of a certified CEMS, will or would have been impossible or impractical;
    - ii. The estimated time period of operation time in the absence of a certified CEMS will be or was reasonable in duration based on installation or repair time, delivery dates, replacement parts, or materials, or current unavailability of essential equipment parts or materials;
    - iii. All actions necessary and required by any applicable preventative maintenance and malfunction abatement plan will be or have been implemented.

*Authority for term: [OAC rule 3745-77-07(A)(3)]*

- (5) The permittee shall submit written reports that identify days during which the daily PWR of P014 was exceeded within 30 days of the date of the exceedance.

*Authority for term: [OAC rule 3745-77-07(A)(3)]*

- (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

*Authority for term: [OAC rule 3745-77-07(A)(3)]*



f) Testing Requirements

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

a. Emission Limitation:

Particulate emissions (PE) shall be limited to 0.010 gr/dscf of exhaust gases and no visible emissions.

Applicable Compliance Method

Compliance shall be determined in accordance with 40 CFR 60 Appendix A, Methods 1 -5 and the procedures specified in OAC rule 3745-17-03(B)(1). Compliance with the novisible emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(1),

b. Emission Limitation:

PE shall not exceed 10.5 tons per year.

Applicable Compliance Method

Compliance shall be determined using the following equation:

$$(\text{Tested emission rate in grains per dry standard cubic feet}) * 27,841 \text{ dscf/min} * 60 \text{ min/hr} \div 7,000 \text{ gr/lbs} = \text{lb/hr}$$

$$\text{lb/hr} * (\text{actual hours of operation}) \text{ hr/yr} * 0.0005 \text{ ton/lb} = \text{tons per year}$$

c. Emission Limitation:

Emissions of NO<sub>x</sub> shall be limited to 8.9 lbs/hr and 39.0 TPY.

Applicable Compliance Method

Compliance shall be determined by using the emission factor (As supplied by the applicant from the manufacture) of 0.04 lb/min of NO<sub>x</sub> and multiplying by 60 min/hr to obtain the hourly emission rate. Compliance with the 10.5 TPY NO<sub>x</sub> emission limit shall be determined by a one-time calculation based upon maximum potential hours of operation as detailed in the following equation:

$$0.04 \text{ lb/min} * 60 \text{ min/hr} * 8,760 \text{ hrs/yr} * 0.0005 \text{ T/lb} = 10.5 \text{ TPY}$$

d. Emission Limitation:

Emissions of organic compounds shall be limited to 8.9 lbs/hr and 39.0 TPY.



Applicable Compliance Method

Compliance with the hourly limit may be determined using the following equation:

$$0.107 \text{ lb of OC/ton of feed} * 4.17 \text{ tons/hr} = 0.45 \text{ lb/hr,}$$

Where,

0.107 lb of OC/ton of feed is derived from samples of the raw material taken by the permittee. If required, compliance with this emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

Compliance with the annual limit shall be determined using the following equation:

$$0.45 \text{ lb/hr} * (\text{actual hours of operation}) * 0.0005 \text{ ton/lb} = \text{tpy}$$

- e. Emission Limitation:

Fugitive PE shall not exceed 20 per cent opacity as a three minute average.

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR 60 Appendix A, Method 9.

- f. Emission Limitation:

Emissions of CO shall be limited to 78.0 lbs/hr and 341.7 TPY.

Applicable Compliance Method

Compliance shall be determined in accordance with 40 CFR 60 Appendix A, Method 10 and the procedures specified in OAC rule 3745-21-03.

Compliance shall be determined by multiplying the hourly emission rate, determined through the performance testing specified above, by 8,760 hr/yr and 0.0005 ton/lb to obtain the tons per year of carbon monoxide.

- g. Emission Limitation:

Emissions of SO<sub>2</sub> shall be limited to 78.1 lbs/hr

Applicable Compliance Method

Compliance shall be determined in accordance with the continuous emissions monitoring found in d)(1). Compliance with the ton per year limitation shall be determined in accordance with the continuous emissions monitoring found in d)(1).



Within 60 days of start-up of the emissions unit, the permittee shall conduct certification tests of the continuous SO<sub>2</sub> monitoring system pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 2. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office within 30 days after the test is completed. Certification of the continuous SO<sub>2</sub> monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 2.

h. Emission Limitation:

PE from the stack shall not exceed 0.01 lb/hr and 0.01 TPY.

Applicable Compliance Method

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", and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

i. Emission Limitation:

There shall be no visible emissions of PE from the stack.

Applicable Compliance Method

If required, visible particulate emissions shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

- (1) None.



**8. P020, Multiple Hearth Roaster #2**

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

Multiple Hearth Roaster #2: 100 ton per day natural gas/propane-fired multiple hearth roaster #2 controlled by dry scrubber (96.1% control efficiency for SO<sub>2</sub>) and baghouse (99% control efficiency for PE) and associated truck load-out operation controlled with a toritbaghouse (99.9% control for PE)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) g(1) and g(2)
- 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
<b>Multiple Hearth Roaster #2</b>		
a.	ORC 3704.03(T)	Particulate emissions (PE) shall not exceed 0.010 gr/dscf.  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 1.04 pound per ton (lbs/ton).  See b)(2)e. below.  Volatile organic compounds (VOC) emissions shall not exceed 1.99 lbs/ton  See b)(2)e. below.  The requirements of this rule include compliance with the sulfur dioxide (SO <sub>2</sub> ) and carbon monoxide (CO) emissions limitations established pursuant to OAC rule 3745-31-10 through 20.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	PM-10/PM-2.5 shall not exceed 0.007 gr/dscf and 8.4 tons per year (TPY).  See b)(2)c. below.
c.	OAC rule 3745-31-05(E), as effective 12/01/06	See b)(2)d. below.
d.	OAC rules 3745-31-10 through 20	SO <sub>2</sub> emissions shall not exceed 78.1



**Effective Date:** To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>pounds per hour (lbs/hr) and 633 ppmv, as a 3-hour, rolling average.</p> <p>CO emissions shall not exceed 4.72 lbs/ton.</p> <p>See b)(2)e. below.</p> <p>The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D).</p> <p>See b)(2)a., b. and c)(1) below.</p>
e.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD modeling)	<p>SO<sub>2</sub> emissions from emissions units P014 and P020, combined, shall not exceed 342.1 tons, as a 12-month, rolling summation.</p> <p>CO emissions from emissions units P014 and P020, combined, shall not exceed 86.2 tons, as a 12-month, rolling summation.</p>
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 per cent opacity as a six-minute average, except as provided by rule.
g.	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to ORC 3704.03(T).
h.	OAC rule 3745-18-06(E)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 3745-31-10 through 20.
<b>Multiple Hearth Roaster #2 Load-Out</b>		
i.	OAC rule 3745-31-05(A)(3)	<p>PE from the stack shall not exceed 0.01 lb/hr and 0.01 TPY.</p> <p>No visible emissions of PE from the toritbagogue stack serving the truck load-out operations.</p>
j.	OAC rule 3745-17-07(A)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
k.	OAC rule 3745-17-11(B)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
l.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(2), d)(3), and d)(4).

(2) Additional Terms and Conditions

- a. As part of the Best Available Control Technology (BACT) determination for SO<sub>2</sub>, the emissions from the multiple hearth roaster shall be vented to an operating circulating dry scrubber and a baghouse. Compliance with the control efficiency requirement shall be demonstrated by compliance with the short term SO<sub>2</sub> emission limit in b)(1)d.

*[Authority for term: OAC rule 3745-31-05(A)(3)]*

- b. As part of the Best Available Control Technology (BACT) determination for CO, the permittee shall only supply natural gas or propane to the burners of the multiple hearth roaster; and, establish and maintain a plan to ensure that the burners are operated in accordance with good combustion practices as recommended by the burner manufacturer. Compliance with the short term CO emission limits in b)(1)d shall be demonstrated through testing as required in f)(2).

*[Authority for term: OAC rule 3745-31-05(A)(3)]*

- c. 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 the emission limits/control measures no longer apply.

*[Authority for term: OAC rule 3745-31-05(A)(3)]*

- d. 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.

PTI P0110438 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. The use of a baghouse with a control efficiency of 99%; and
- ii. 0.007 gr/dscf and 8.4 TPY of PM-10/PM2.5.

*[Authority for term: OAC rule 3745-31-05(A)(3)]*

- e. The emission limits established in this permit for CO, VOC and NO<sub>x</sub> were based on limited emission factor data from the testing of another similar, but not identical roaster. No other emission factor data was found to be representative of the new roaster. Because of these facts, at the time this permit was written, it is unclear if the emission factors used to establish these limits are appropriate to use to establish limits for the new roaster.

Because of these uncertainties, this permit requires AMG Vanadium to conduct emissions tests for these pollutants (See f)(2) below). Once the emissions tests are complete and the data is verified, AMG Vanadium may request that the director revise these emissions limits taking into account the new data.

- f. The permittee shall maintain a written quality assurance/quality control plan for the continuous SO<sub>2</sub> monitoring system, designed to ensure continuous valid and representative readings of SO<sub>2</sub> emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous SO<sub>2</sub> monitoring system must be kept on site and available for inspection during regular office hours.

*[Authority for term: 40 CFR 52.21 and OAC rules 3745-31-01 through 20]]*

- g. The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

*[Authority for term: 40 CFR 52.21 and OAC rules 3745-31-01 through 20]]*

- h. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

*[Authority for term: 40 CFR 52.21 and OAC rules 3745-31-01 through 20]]*

- i. The control equipment specified for this emissions unit is the same control equipment used to control emissions from emissions unit P014. To ensure compliance with the emission limitations in this permit, the permittee is prohibited from operating emissions units P014 and P020 concurrently, except during periods of operational transition between multiple hearth roasters.



*[Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR 52.21 and OAC rules 3745-31-01 through 20]*

c) Operational Restrictions

- (1) The permittee shall supply only natural gas or propane to the burners in this emissions unit.

*[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-17-11]*

- (2) In order to comply with the rolling, 12-month limitation for SO<sub>2</sub> and CO, the permittee shall restrict the combined amount of catalyst processed in P014 and P020 to 36,500 tons per rolling, 12-month period. The permittee shall utilize existing catalyst roaster production records to demonstrate compliance with the rolling, 12-month limitation.

*[Authority for term: OAC rule 3745-31-05(D)]*

d) Monitoring and/or Recordkeeping Requirements

- (1) 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 roaster stack and 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 emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item "d." above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

*[Authority for term: OAC rules 3745-17-07(A) and (B), and OAC rule 3745-77-07(A)(3)]*



- (2) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the toritbaghouse stack serving the truck load-out operations of 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. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions

*[Authority for term: OAC rules 3745-17-07(A), 40 CFR Part 64, and OAC rule 3745-77-07(A)(3)]*

- (3) The CAM plan for this emissions unit is based on the use of visible emission observations as an indicator of baghouse performance. For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack, regardless of whether it exceeds the 20% opacity standard. The observer will be familiar with Method 22-like procedures. The Method 9 observer will be familiar with Method 9 procedures and will be certified.

Authority for term: [40 CFR Part 64 and OAC rule 3745-77-07(A)(3)]

- (4) The permittee shall monitor and record the differential pressures daily, while the emissions unit is in operation.

Authority for term: [40 CFR Part 64]

- (5) The permittee shall maintain on site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous SO<sub>2</sub> monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6. The letter(s)/document(s) of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

- (6) The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of data obtained by the continuous SO<sub>2</sub> monitoring system including, but not limited to:



- a. emissions of SO<sub>2</sub> in parts per million on an instantaneous (one-minute) basis;
  - b. emissions of SO<sub>2</sub> in pounds per hour and in all units of the applicable standard(s) in the appropriate averaging period;
  - c. results of quarterly cylinder gas audits;
  - d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
  - e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
  - f. hours of operation of the emissions unit, continuous SO<sub>2</sub> monitoring system, and control equipment;
  - g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous SO<sub>2</sub> monitoring system;
  - h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous SO<sub>2</sub> monitoring system; as well as,
  - i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).
- (7) The permittee shall maintain monthly records of the following information:
- a. the amount of catalyst processed in P014 and P020, separately;
  - b. the monthly emissions of SO<sub>2</sub> and CO emissions for P014 and P020, separately and combined;
  - c. the rolling, 12-month summation of the amount of catalyst processed in P014 and P020, combined; and
  - d. the rolling, 12-month summation of the SO<sub>2</sub> and CO emissions for P014 and P020, separately and combined.

\* The rolling, 12-month summations for CO shall be calculated by using the equation in f)(1)c. The SO<sub>2</sub> rolling, 12-month summation shall be calculated using records required in d)(3).

*[Authority for term: OAC rule 3745-31-05(D)]*

- (8) In the event that the CEMS breaks down in such a manner that a certified CEMS is unobtainable, the permittee shall maintain records of the hourly SO<sub>2</sub> emissions, in pounds per hour, calculated from sulfur content of the feed, determined using a LECO sulfur analyzer which employs a combustion-infrared absorption method, and the catalyst feed rate and as follows:



$$SO_2 \text{ emissions } \left( \frac{lbs}{hr} \right) = \text{sulfur content of feed} (\%) * \text{hourly feed rate } \left( \frac{tons}{hr} \right) * 2,000 \frac{lbs}{ton} * (1 - \text{control efficiency})$$

This requirement does not eliminate the requirement to comply with 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

*[Authority for term: 40 CFR 52.21 and OAC rules 3745-31-10 through 20]*

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate local air agency or District Office) in writing of any fuel supplied to the burners in this emissions unit other than natural gas or propane.

*[Authority for term: [OAC rule 3745-31-05 and OAC rule 3745-77-07]*

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO<sub>2</sub> monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports in the month following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of SO<sub>2</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-18, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
  - b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous SO<sub>2</sub> and other associated monitors;
    - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
    - iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
    - v. the total SO<sub>2</sub> emissions for the calendar quarter (tons);
    - vi. the total operating time (hours) of the emissions unit;



- vii. the total operating time of the continuous SO<sub>2</sub> monitoring system while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous SO<sub>2</sub> monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\*\* of the continuous SO<sub>2</sub> monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime\*\* of the continuous SO<sub>2</sub> monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

\* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

\*\* each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

*[Authority for term: 40 CFR 52.25, OAC rules 3745-31-10 through 20, and OAC rule 3745-77-07]*

- (3) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the 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.

*(Authority for term: OAC rule 3745-17-07(A) and OAC rule 3745-77-07)*



- (4) The permit shall submit quarterly written reports that identify any exceedance of the following:
- a. the rolling, 12-month catalyst operational restriction;
  - b. the rolling, 12-month emissions limitations for SO<sub>2</sub> and CO.

*[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07]*

- (5) In the event that the CEMS breaks down in such a manner that a certified CEMS is unobtainable, the permittee shall immediately notify the Ohio EPA. If the CEMS remains uncertified for more than seventy-two hours, the permittee shall provide a written statement to the director within two weeks of the date of the malfunction. The immediate notification and written statement shall include the following:

- a. Identification and location of such equipment including the OEPA permit number for each contaminant source;
- b. The estimated or actual duration of the operation of the emissions unit in the absence of a certified CEMS;
- c. Statements demonstrating that
  - i. Shutdown of source operation, during the period of time in absence of a certified CEMS, will or would have been impossible or impractical;
  - ii. The estimated time period of operation time in the absence of a certified CEMS will be or was reasonable in duration based on installation or repair time, delivery dates, replacement parts, or materials, or current unavailability of essential equipment parts or materials;
  - iii. All actions necessary and required by any applicable preventative maintenance and malfunction abatement plan will be or have been implemented.

*[Authority for term: 40 CFR 52.21, OAC rules 3745-31-10 through 20, and OAC rule 3745-77-07]*

- (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

*[Authority for term: OAC rule 3745-77-07]*

f) Testing Requirements

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



a. Emissions Limitation:

PE shall not exceed 0.010 gr/dscf.

Applicable Compliance Methods:

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. See f)(2) below.

b. Emissions Limitation:

NO<sub>x</sub> emissions shall not exceed 1.04 lbs/ton.

Applicable Compliance Methods:

Nitrogen oxides 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. See f)(2) below.

c. Emissions Limitation:

VOC emissions shall not exceed 1.99 lbs/ton.

Applicable Compliance Methods:

Organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A 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. See f)(2) below.

d. Emissions Limitations:

PM-10/PM-2.5 shall not exceed 0.007 gr/dscf.

PM-10/PM-2.5 shall not exceed 8.4 tons per year.

Applicable Compliance Methods:

PM-10/PM-2.5 emissions shall be determined according to test Methods 1-4, 201 or 201A, and 202 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" and 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office. See f)(2).



Compliance with the annual emission limitation shall be demonstrated by multiplying the maximum flow rate through the baghouse (in dscfm) by the short term emission rate (in gr/dscf) determined during the most recent stack test, multiplying by 525,600 min/year, and dividing by 7,000gr/lb and 2,000 lbs/ton.

e. Emissions Limitations:

CO emissions shall not exceed 4.72 lbs/ton.

CO emissions from emissions units P014 and P020, combined, shall not exceed 86.2 tons, as a 12-month, rolling summation.

Applicable Compliance Methods:

Carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 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. See f)(2) below.

Compliance with the 12-month rolling limitation shall be demonstrated by: multiplying the rolling, 12-month summation of the catalyst roasted (in tons) by the short term emission rate determined during the most recent stack test (in lbs/ton) for each of P014 and P020; summing the results for P014 and P020 for each 12-month, rolling period; and dividing the total by 2,000 lbs/ton.

f. Emissions Limitations:

SO<sub>2</sub> emissions shall not exceed 78.1 lbs/hr and 633 ppmv, as a 3-hour, rolling average.

SO<sub>2</sub> emissions from emissions units P014 and P020, combined shall not exceed 342.1 tons, as a 12-month, rolling summation.

Applicable Compliance Methods:

Sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 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. See f)(2) below.

Ongoing compliance with the SO<sub>2</sub> emission limitations contained in this permit, 40 CFR Part 60 and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.



g. Emissions Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20 per cent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9. See f)(2) below.

h. Emissions Limitation:

PE from the stack shall not exceed 0.01 lb/hr and 0.01 TPY.

Applicable Compliance Method

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", and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

i. Emissions Limitation:

No visible emissions of PE from the toritbaghouse stack serving the truck load-out operations.

Applicable Compliance Method

If required, visible particulate emissions shall be determined according to USEPA Method 22.

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

- a. The emission testing shall be conducted within 3 months after achieving the maximum production rate at which the facility will be operated, but no later than 180 days after initial start-up of this emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitations for PE, PM-10/PM-2.5, CO, NO<sub>x</sub>, VOC and SO<sub>2</sub>, and the visible particulate emissions limitation.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For SO<sub>2</sub>, Methods 1-4 and 6 or 6C of 40 CFR Part 60, Appendix A;  
For PE, Methods 1-5 of 40 CFR Part 60, Appendix A;



For PM-10/PM-2.5, Methods 1-4 of 40 CFR Part 60, Appendix A, and 201 or 201A, and 202 of 40 CFR Part 51, Appendix M;  
For CO, Methods 1-4 and Method 10 of 40 CFR Part 60, Appendix A;  
For NO<sub>x</sub>, Methods 1-4 and Method 7 of 40 CFR Part 60, Appendix A;  
For VOC, Methods 1-4 and Method 18, 25, or 25A of 40 CFR Part 60, Appendix A; and,  
For visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A.

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

- d. The testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.
  - e. 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, Southeast 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, Southeast District Office refusal to accept the results of the emission test(s).
  - f. Personnel from the Ohio EPA, Southeast 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
  - g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast 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, Southeast District Office.
- (3) Ongoing compliance with the SO<sub>2</sub> emission limitations contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.
- g) Miscellaneous Requirements
- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions units maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule



**Draft Title V Permit**  
AMG Vanadium, Inc.  
**Permit Number:** P0105123  
**Facility ID:** 0630010005

**Effective Date:** To be entered upon final issuance

3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

- (2) The permittee shall not operate emissions unit P014 above a process weight rate of 80 tons per day.



9. P024, Outside Silo Hopper

Operations, Property and/or Equipment Description:

Outside silo hopper (installed in 1953 no PTI)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(A)(1)	Visible particulate emissions (PE) from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.
b.	OAC rule 3745-17-11(B)(2)	Particulate Emissions (PE) shall not exceed 0.48 lb/hr for emissions unit P024.

(2) Additional Terms and Conditions

a. Except as provided in OAC rule 3745-17-07(A)(3), visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except:

- i. visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes; but
- ii. shall not exceed 60 percent opacity, as a six-minute average, at any time; and
- iii. the presence of uncombined water shall not be deemed a violation for failure of stack emissions meeting this requirement.

Authority for term: [OAC rule 3745-17-07(A)(1) and (2)]

b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent



fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

Authority for term: [OAC 3745-17-08(A)(1)]

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

*[Authority for term: OAC rules 3745-17-07(A), and OAC rule 3745-77-07(A)(3)]*

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions 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 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.



*[Authority for term: OAC rule 3745-77-07]*

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

*[Authority for term: OAC rule 3745-77-07]*

f) Testing Requirements

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

a. Emissions Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

b. Emissions Limitation:

Particulate Emissions (PE) shall not exceed 0.48 lb/hr for emissions unit P024.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.