



12/8/2014

Mr. John Dimino
HA INTERNATIONAL LLC
4243 SOUTH AVE
Toledo, OH 43615

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0448011215
Permit Number: P0117980
Permit Type: OAC Chapter 3745-31 Modification
County: Lucas

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice 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 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
PO Box 1049
Columbus, Ohio 43216-1049

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

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 issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
TDES; Michigan; Indiana; Canada

PUBLIC NOTICE

12/8/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

HA INTERNATIONAL LLC

4243 SOUTH AVE,
TOLEDO, OH 43615

Lucas County

FACILITY DESC.: All Other Miscellaneous Chemical Product and Preparation Manufacturing

PERMIT #: P0117980

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Chapter 31 modification of previously permit exempt mineral packaging operation to vent the baghouse from inside the facility to outside the facility

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: Brad Faggionato, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

HA International produces refractory coatings used in the foundry industry. Typically these are silica based mixes with water or hydrocarbon-based liquids added. This emissions unit currently packages ground minerals (silica flour and pyrax) from its existing storage silos into supersacks or bins for subsequent use as a refractory coating. The packaging operation (P028) is completely enclosed within the production building. The emission unit was constructed in 1996, exhausted through a dust collector at the facility and was issued a permit. When a new filter system was built for this emissions unit, the filter system was exhausted indoors. It was determined, at this time, a permit was no longer required and the permit was revoked. The facility will now redirect the controls to exhaust outside the building to address personnel exposure concerns. Current OAC rule require a permit even if the emission unit exhausts indoors. The emission unit will be issued a permit.

3. Facility Emissions and Attainment Status:

The facility has a facility-wide synthetic minor limit for VOC, PE and HAP. All emissions are minor. All criteria pollutants are in attainment for Lucas County.

4. Source Emissions:

BAT - PE/PM₁₀

The permittee's application states that typically 410 pounds of dust is collected in a 40-hour operating week by the particulate controls and 15 supersacks are packaged per 8-hour shift. Taking into account a minimum removal efficiency of 99.5% for the particulate filter as reported in the permittee application, which is consistent with AP-42, fifth edition, 11.19.2-14 for pulverized mineral processing, the total particulate emitted in the stack without controls would be $410 \text{ pounds} / 0.995 = 412 \text{ pounds}$. Based upon 15 supersacks typically processed in an 8-hour period, in a typical 40-hour week $15 \times (40/8) = 75$ supersacks would be processed per week. Therefore each supersack should typically release $412 \text{ pounds} / 75 \text{ supersacks} = 5.5 \text{ pounds}$ of particulate into the stack.

The permittee states in the permit application that each supersack requires 5 minutes to fill and that the minimum turnaround between fillings is 10 minutes. Therefore it requires 15 minutes to process each supersack and the potential production rate is 4 supersacks per hour. Then the potential hourly particulate emission rate (PE), uncontrolled, would be $(4 \text{ supersacks per hour}) \times (5.5 \text{ pounds of PE per supersack}) = 22.0 \text{ pounds of PE per hour}$. Taking into account the particulate control filter, the potential particulate emissions rate would be $(22.0 \text{ pounds per hour}) \times (1 - 0.995) = 0.11 \text{ pound of PE per hour}$.

The uncontrolled potential annual emissions would be $(22.0 \text{ pounds per hour}) \times (8760 \text{ hours per year}) = 192,720 \text{ pounds per year}$ (2000 pounds per ton) or 96.4 tons of PE per year. The controlled potential annual emissions would be



$(0.11 \text{ pound of PE per hour}) \times (8760 \text{ hours per year}) / (2000 \text{ pounds per ton})$ or 0.5 ton of PE per year.

The permittee makes the assumption that since the emissions pass through a particulate filter, that the particulate filter would be more likely to capture the larger particulate. Therefore they are conservatively assuming that all the stack emissions are PM₁₀.

Pollutant	Uncontrolled		Controlled	
	Pounds per hour	Tons per year	Pounds per hour	Tons per year
PE/PM ₁₀	22.0	96.4	0.11	0.5

Based on the BAT guidance dated 2/18/2014, the most appropriate way to express BAT would be the design efficiency of the applicable air contaminant control device. The particulate filter has the most effect on the emissions and is therefore the best expression of BAT. Permittee application and AP-42 indicate that the 99.5% efficiency should be achievable by the control equipment used on this emissions unit. An initial performance test will not be required to verify efficiency. The BAT guidance states that the permittee will be required to maintain the equipment following manufacturer's recommendations in order to ensure the source continues to operate as designed. The permittee will also be required to keep a record of the maintenance on the unit along with the manufacturer's recommendations. The Terms and Conditions Library terms developed for OAC rule 3745-17-11(C) were used as a template for these terms.

OAC rule 3745-17-11(B)

Per the previous BAT analysis, the permittee is potentially able to process 4 supersacks per hour. Each supersack holds 2,000 pounds. Therefore the maximum process weight (P) is $(4 \text{ supersacks per hour}) \times (2,000 \text{ pounds per supersack}) / (2,000 \text{ pounds per ton})$ or 4 tons per hour. The allowable particulate emissions rate (E) in Table I is defined for (P) between 0.5 tons per hour and 30 tons per hour as $(E) = 4.10 (P)^{0.67}$ or 10.4 pounds PE per hour. Figure II defines Allowable mass rate of particulate emissions (A) for the Uncontrollable mass rate of particulate emissions (U) between 20 pounds per hour and 1000 pounds per hour as $A = 0.5782 (U)^{0.6456}$ or 4.3 pounds of PE per hour for $U = 22.0$ pounds per hour. Therefore, since Figure II is more stringent, the emission limit is 4.3 pounds of PE per hour. Since the potential particulate emissions were calculated as 0.11 pounds per hour, this emissions unit is shown to be in compliance with this emission limit.

Facility wide emissions limit of 39.5 tons of PE per year

The facility wide emissions limit referenced in the Facility wide section was updated to include the emissions for this emissions unit. The emissions limit was not increased. Any increase to this emissions limit would require a Chapter 31 modification for all the emissions units that are part of the facility wide emission limit since this limit is referenced in each emissions unit.

The facility requested tracking the amount of emissions using weight of material filled per month instead of number of supersacks filled. The facility already tracks the throughput of material in pounds but do not track the number of supersacks filled. Therefore since each filled supersack holds 2000 pounds and it has been determined that each filled supersack will release 5.5 pounds of particulate uncontrolled, that the facility will record the pounds of material filled per month and then calculate the uncontrolled emissions by dividing this amount by 2000 and multiplying by 5.5 pounds.



5. Conclusion:

This emissions unit is part of the facility wide emissions limit for particulate to avoid Title V. Therefore this permit will need to be issued draft and final to make it federally enforceable.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.5
PM ₁₀	0.5



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
HA INTERNATIONAL LLC**

Facility ID:	0448011215
Permit Number:	P0117980
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	12/8/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



**Division of Air Pollution Control
Permit-to-Install and Operate
for
HA INTERNATIONAL LLC**

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Draft Permit-to-Install and Operate

HA INTERNATIONAL LLC

Permit Number: P0117980

Facility ID: 0448011215

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448011215
Application Number(s): A0052119
Permit Number: P0117980
Permit Description: Chapter 31 modification of previously permit exempt mineral packaging operation to vent the baghouse from inside the facility to outside the facility
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 12/8/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

HA INTERNATIONAL LLC
4243 SOUTH AVE
TOLEDO, OH 43615

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

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install and Operate

HA INTERNATIONAL LLC

Permit Number: P0117980

Facility ID: 0448011215

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0117980

Permit Description: Chapter 31 modification of previously permit exempt mineral packaging operation to vent the baghouse from inside the facility to outside the facility

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

Emissions Unit ID:	P028
Company Equipment ID:	Fill Station 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
HA INTERNATIONAL LLC
Permit Number: P0117980
Facility ID: 0448011215
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



Draft Permit-to-Install and Operate
HA INTERNATIONAL LLC
Permit Number: P0117980
Facility ID: 0448011215
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The combined emissions of particulate (PE) from all stacks of all emission units at this facility shall not exceed 39.6 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
 - a) **Particulate emissions:**

The combined facility-wide emissions of particulate shall include the following emission units: P002, P005, P010, P011, P018, P021, P022, P023, and P028.

 - (1) The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month particulate emission limitation:
 - (a) the company identification for each product;
 - (b) the number of tons of all dry materials mixed for P002, P005, P010, P011, P018, P021, P022, and P023;
 - (c) The amount of material filled in P028, in pounds;
 - (d) the monthly total PE emission rate for P002, P005, P010, P011, P018, P021, P022, and P023 from the stack for all dry solid materials, calculated as $(b.) \times (1\%) \times (95\%) \times (1-99\%)$, in tons per month;
 - (e) the monthly total PE emission rate for P028 from the stack for all dry solid materials, calculated as $[(c)/(2000 \text{ pounds per supersack})] \times (5.5 \text{ pounds per supersack}) \times (1-0.995)/(2000 \text{ pounds per ton})$, in tons per month; and
 - (f) the combined facility-wide rolling, 12-month summation of the stack particulate emissions for all emissions units, calculated by adding the current month's PE emission rate from the stack of all emission units at this facility to the PE emissions for the preceding eleven calendar months from all emission units at this facility, in tons per year, i.e., the rolling, 12-month summation of d. and e. for all emissions units.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations, operational restrictions and/or control device



Draft Permit-to-Install and Operate

HA INTERNATIONAL LLC

Permit Number: P0117980

Facility ID: 0448011215

Effective Date: To be entered upon final issuance

operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- a) an identification of each month during which the facility-wide PE from all stacks exceeded 39.6 tons as a rolling, 12-month summation, and the actual 12-month summation of any such PE for each such month; and
- b) If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.



Draft Permit-to-Install and Operate
HA INTERNATIONAL LLC
Permit Number: P0117980
Facility ID: 0448011215
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P028, Fill Station 1

Operations, Property and/or Equipment Description:

Supersack Filling Station

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

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

a. b)(1)b., b)(1)c., c)(2) &(3) and d)(2) through (6)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Install a particulate control filter with a design efficiency of at least 99.5% control of particulate matter. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b. and b)(2)c.
	OAC rule 3745-31-05(D)	Facility-wide filterable particulate emissions (PE) from all stacks shall not exceed 39.6 tons as a rolling, 12-month period. See B.2.
c.	OAC rule 3745-31-05(E)	Particulate matter less than or equal to 10 microns in diameter (PM ₁₀) shall not exceed 0.5 ton per year. Employ a particulate control filter with a design efficiency of at least 99.5% control of particulate matter.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average unless otherwise



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		specified by the rule.
d.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 4.3 pounds per hour.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies for PM₁₀ emissions until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(b) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM₁₀ emissions from this air contaminant source since the calculated annual emission rate for PM₁₀ is less than ten tons per year, taking into account the voluntary restriction from OAC rule 3745-31-05(E).

c) Operational Restrictions

- (1) The permittee shall employ a particulate filter whenever this emissions unit is in operation.
- (2) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

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. 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 operations;



- d. The total duration of any visible emission incident; and
- e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible 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.

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (6) The permittee shall maintain records that document any time periods when the particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the particulate filter was not operated according



to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA District Office or local air agency upon request.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - 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.
- (3) The permittee shall identify the following information in the annual permit evaluation report:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. employing a particulate filter whenever the emissions unit is in operation;
 - ii. operating the particulate filter according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit is in operation;
 - iii. performing periodic inspections of the particulate filter at a frequency that shall be based upon the recommendation of the manufacturer instructions or operating manuals with any documented modifications deemed necessary by the permittee or operator; and
 - iv. conducting an annual comprehensive inspection of the particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred since the last annual permit evaluation report or the date of permit issuance, the permittee shall submit a report that states that no deviations (excursions) occurred.

- (4) 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.

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:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A, using methods and procedures specified in OAC rule 3745-17-03(B)(1); or other U.S. EPA approved test method, with prior approval from the Ohio EPA.

- b. Emission Limitation:

PE shall not exceed 4.3 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A, or other U.S. EPA-approved test method, with prior approval from the Ohio EPA.



c. Emission Limitation:

PM₁₀ shall not exceed 0.5 ton per year.

Applicable Compliance Method:

This is based on a one-time calculation based on the maximum hourly emission limitation of 0.11 pound of PM₁₀ per hour multiplied by 8760 hours per year and divided by 2000 pounds per ton.

If required, the permittee shall demonstrate compliance with the maximum hourly emissions limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other U.S. EPA-approved test method, with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.