



1/6/2015

Certified Mail

GERALD ZANDER
GRAPHITE SALES INC
220 TWP RD 791
NOVA, OH 44859

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0303000138
Permit Number: P0117762
Permit Type: Renewal
County: Ashland

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
GRAPHITE SALES INC**

Facility ID:	0303000138
Permit Number:	P0117762
Permit Type:	Renewal
Issued:	1/6/2015
Effective:	1/6/2015
Expiration:	1/6/2020



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
GRAPHITE SALES INC

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Final Permit-to-Install and Operate
GRAPHITE SALES INC
Permit Number: P0117762
Facility ID: 0303000138
Effective Date: 1/6/2015

Authorization

Facility ID: 0303000138
Application Number(s): A0051909
Permit Number: P0117762
Permit Description: Renewal FEPTIO for a 20 tph crushing operation with a baghouse and 750 hp diesel engine (SI ICE).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/6/2015
Effective Date: 1/6/2015
Expiration Date: 1/6/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

GRAPHITE SALES INC
220 TWP RD 791
Nova, OH 44859

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

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install and Operate
GRAPHITE SALES INC
Permit Number: P0117762
Facility ID: 0303000138
Effective Date: 1/6/2015

Authorization (continued)

Permit Number: P0117762
Permit Description: Renewal FEPTIO for a 20 tph crushing operation with a baghouse and 750 hp diesel engine (SI ICE).

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

Emissions Unit ID:	P902
Company Equipment ID:	P902
Superseded Permit Number:	P0104802
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
GRAPHITE SALES INC
Permit Number: P0117762
Facility ID: 0303000138
Effective Date: 1/6/2015

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



Final Permit-to-Install and Operate
GRAPHITE SALES INC
Permit Number: P0117762
Facility ID: 0303000138
Effective Date: 1/6/2015

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 permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements is not delegated to Ohio EPA at the time of this permit processing. 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.gpoaccess.gov> or by contacting the appropriate Ohio EPA District Office of Local Air Agency.
3. 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.



Final Permit-to-Install and Operate
GRAPHITE SALES INC
Permit Number: P0117762
Facility ID: 0303000138
Effective Date: 1/6/2015

C. Emissions Unit Terms and Conditions



1. **P902, 20 tph Crushing Operations with 750 hp Diesel Stationary Internal Compression Ignition Engine (SI ICE) and Baghouse**

Operations, Property and/or Equipment Description:

20 tph crushing and associated material handling operations w/ 750 hp diesel engine (SI ICE) and baghouse

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

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

a. None.

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

a. b)(1)b., b)(2)d., c)(2), d)(3), e)(1), f)(1)f., f)(1)h., f)(1)j., f)(1)l., and f)(1)p.

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)(a)	<p><u>Material Handling operations</u> 0.004lb particulate emissions (PE)/hr& 0.004 ton PE/yr from the stack serving this emissions unit. See b)(2)a.</p> <p>Visible PE shall not exceed zero percent opacity as a six-minute average.</p> <p>0.78 ton of fugitive PE/yr.</p> <p>0.29 ton of fugitive particulate matter 10 microns or less in size (PM10)/yr.</p> <p>Visible PE from fugitive dust shall not exceed twenty percent opacity as a three-minute average. See b)(2)i.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>See b)(2)c.</p> <p><u>Diesel engine operations</u> 18.00lbs nitrogen oxides (NOx)/hr. 4.13lbs carbon monoxide (CO)/hr. 0.53lb organic compounds (OC)/hr. 0.33 lb PE/hr. See b)(2)b. 6.07lbs sulfur dioxide (SO₂)/hr.</p> <p>Visible PE shall not exceed 10% opacity, as a 6-minute average, except during start-up and shutdown.</p> <p>See b)(2)c and c)(1).</p>
b.	OAC rule 3745-31-05(D)	<p>16.20 tons NOx per rolling, 12-month period.</p> <p>3.72 tons CO per rolling, 12-month period.</p> <p>0.48 ton OC per rolling, 12-month period.</p> <p>0.30 ton PE per rolling, 12-month period. See b)(2)b.</p> <p>5.46 tons SO₂ per rolling, 12-month period.</p> <p>See b)(2)d.</p>
c.	OAC rule 3745-17-07(A)	See b)(2)e.
d.	OAC rule 3745-17-07(B)	See b)(2)f.
e.	OAC rule 3745-17-08(B)	See b)(2)g.
f.	OAC rule 3745-17-11(B)(5)(b)	0.062 lb PE per mmBtu of actual heat input.
g.	OAC rule 3745-18-06(G)	See b)(2)h.



(2) Additional Terms and Conditions

- a. All PE from the stack serving this emissions unit are assumed to be PM10.
- b. The emission limitation of PE due to the combustion of #2 fuel oil is more restrictive than the potential to emit of PM10 using an emission factor from AP-42 Section 3.4 – Large Stationary Diesel and All Stationary Dual Fuel Engines (10/96). Therefore, a limit on the emissions of PE shall be sufficient to limit the emissions of PM10.
- c. The "Best Available Technology" (BAT) control requirements for this emissions unit have been determined to be the following:
 - i. the use of a baghouse achieving 95% capture and 99% control efficiencies for various unloading, crushing and transfer points;
 - ii. compliance with OAC rule 17-11(B)(5)(b) and OAC rule 3745-31-05(D); and
 - iii. compliance with the terms and conditions of this permit.

Nothing in b)(2)c.i.-iii.above shall prohibit the permittee from employing other control measures to ensure compliance.

This facility is involved in the process of recovering PE from this emissions unit. Therefore, the use of a baghouse is factored into the determination of the potential to emit for this emission unit.

- d. This permit establishes the following federally enforceable emission limitations based on an operational restriction on the hours of operation [See c)(2)] for the purpose of limiting the potential to emit in order to avoid Title V applicability:
 - i. 16.20 tons of NO_x per rolling, 12-month period;
 - ii. 3.72 tons of CO per rolling, 12-month period;
 - iii. 0.48 ton of OC per rolling, 12-month period;
 - iv. 0.30 ton of PE per rolling, 12-month period; and
 - v. 5.46 ton of SO₂ per rolling, 12-month period.
- e. The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).
- f. This emissions unit is exempt from the visible PE limitation for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.



- g. 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).
- h. This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(B).
- i. Visible emissions from the material processing equipment when processing graphite or carbon materials shall not exceed the following opacity restrictions:

Material Operation	Handling/Processing	Opacity Limit
FEL loading and unloading		20% opacity, as a 3-minute average
Crushing		20% opacity, as a 3-minute average
Screening		20% opacity, as a 3-minute average
Transfer points		20% opacity, as a 3-minute average

c) Operational Restrictions

- (1) The permittee shall only combust #2 fuel oil in this emissions unit, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils". The sulfur content of the #2 fuel oil shall contain no more than 0.5 weight percent sulfur.
- (2) The maximum annual operating hours for this emissions unit shall not exceed 1800, based upon a rolling, 12-month summation of the operating hours.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than #2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall use records of fuel supplier certification to demonstrate compliance with the operational restriction in section c)(1). Records of fuel supplier certification shall include the following information:
 - a. the name of the oil supplier; and
 - b. a statement from the oil supplier that the oil complies with the specifications under the definition of #2 fuel oil in c)(1) above.
- (3) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and



- b. the rolling, 12-month summation of the operating hours.
- (4) Except as otherwise provided in this section, for graphite and carbon processing operations that are not adequately enclosed, the permittee shall perform inspections of such operations during representative, normal operating conditions in accordance with the following minimum frequencies:

Operation/Equipment	Minimum Inspection Frequency
FEL loading and unloading	Once per day of operation
Crusher	Once per day of operation
Screen	Once per day of operation
Transfer points	Once per day of operation

- (5) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information required in section d)(5) shall be kept separately for each graphite or carbon processing operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - 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. all exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit.
 - 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 during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.



The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) 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.

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

0.004 lb PE/hr & 0.004 tons PE/yr from the stack serving this emissions unit

Applicable Compliance Method

The hourly emission limitation was established by combining the following material handling/process operations:

Operation/Equipment	Emission Factor (lbs PE/ton)	Maximum Process Weight Rate (tons/hr)	Capture Efficiency (%)	Control Efficiency (%)
FEL loading and unloading (2 total controlled)	0.007 ⁽¹⁾	20	95	99
FEL loading and unloading (2 total uncontrolled)	n/a ⁽¹⁾	n/a	n/a	n/a
Crusher	0.0054 ⁽²⁾	20	95	99
Screen (uncontrolled)	n/a ⁽²⁾	n/a	n/a	n/a
Transfer Points (controlled)	0.0030 ²	20	95	99
Transfer Points (uncontrolled)	n/a ⁽²⁾	n/a	n/a	n/a

⁽¹⁾ Reference AP-42 Chapter 13, Section 13.2.4, 11/06

⁽²⁾ Reference AP-42 Chapter 11, Section 11.19.2, 08/04

The annual emission limitation was established by combining the following material handling/process operations and dividing by 2000 lbs/ton:



Operation/Equipment	Emission Factor (lbs PE/ton)	Maximum Process Weight Rate* (tons/yr)	Capture Efficiency (%)	Control Efficiency (%)
FEL loading and unloading (2 total controlled)	0.007(1)	36,000	95	99
FEL loading and unloading (2 total uncontrolled)	n/a(1)	n/a	n/a	n/a
Crusher (controlled)	0.0054(2)	36,000	95	99
Screen (uncontrolled)	n/a(2)	n/a	n/a	n/a
Transfer Points (controlled)	0.0030(2)	36,000	95	99
Transfer Points (uncontrolled)	n/a(2)	n/a	n/a	n/a

⁽¹⁾Reference AP-42 Chapter 13, Section 13.2.4, 11/06
⁽²⁾Reference AP-42 Chapter 11, Section 11.19.2, 08/04

*The maximum annual process weight rate is calculated by multiplying the maximum hourly process weight rate by the hourly limitation for the diesel engine.

b. Emission Limitation

Visible PE shall not exceed zero percent opacity as a six-minute average

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60 Appendix A.

c. Emission Limitation

0.78 ton of fugitive PE/yr

0.29 ton of fugitive PM10/yr

Applicable Compliance Method

The PE limitation was established by combining the following material handling/process operations and dividing by 2000 lbs/ton:

Operation/Equipment	Emission Factor (lbs PE/ton)	Maximum Process Weight Rate* (tons/yr)	Uncontrolled Fugitive Emissions (%)
FEL loading and unloading (2 controlled)	0.007	36,000	5
FEL loading and unloading (2 uncontrolled)	0.007	36,000	100



Operation/Equipment	Emission Factor (lbs PE/ton)	Maximum Process Weight Rate* (tons/yr)	Uncontrolled Fugitive Emissions (%)
unloading (2 uncontrolled)			
Crusher (controlled)	0.0054	36,000	5
Screen (uncontrolled)	0.025	36,000	100
Transfer Points (controlled)	0.0030	36,000	5
Transfer Points (uncontrolled)	0.0030	36,000	100

*The maximum annual process weight rate is calculated by multiplying the maximum hourly process weight rate by the hourly limitation for the diesel engine.

The PM10 limitation was established by combining the following material handling/process operations and dividing by 2000 lbs/ton:

Operation/Equipment	Emission Factor (lbs PM10/ton)	Maximum Process Weight Rate* (tons/yr)	Uncontrolled Fugitive Emissions (%)
FEL loading and unloading (2 controlled)	0.003	36,000	5
FEL loading and unloading (2 uncontrolled)	0.003	36,000	100
Crusher (controlled)	0.0024	36,000	5
Screen (uncontrolled)	0.0087	36,000	100
Transfer Points (controlled)	0.0011	36,000	5
Transfer Points (uncontrolled)	0.0011	36,000	100

*The maximum annual process weight rate is calculated by multiplying the maximum hourly process weight rate by the hourly limitation for the diesel engine.

d. Emission Limitation

Visible PE from fugitive dust shall not exceed twenty percent opacity as a three-minute average

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 of 40 CFR Part 60 Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

e. Emission Limitation

18.00lbsNOx/hr



Applicable Compliance Method

The hourly emission limitation represents the potential to emit* for the emissions unit. Therefore, no hourly record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was established by multiplying the rated outlet capacity of 750 horsepower (HP) by an emission factor of 0.024 lbNO_x/HP-hr [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and 7 of 40 CFR Part 60, Appendix A.

f. Emission Limitation

16.20 tons NO_x per rolling, 12-month period

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section d)(3) of the terms and conditions of this permit.

g. Emission Limitation

4.13lbs CO/hr

Applicable Compliance Method

The hourly emission limitation represents the potential to emit* for the emissions unit. Therefore, no hourly record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was established by multiplying the rated outlet capacity of 750 horsepower (HP) by an emission factor of 0.0055 lbs CO/HP-hr [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and 10 of 40 CFR Part 60, Appendix A.

h. Emission Limitation

3.72 tons CO per rolling, 12-month period

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section d)(3) of the terms and conditions of this permit.

i. Emission Limitation

0.53lb OC/hr



Applicable Compliance Method

The hourly emission limitation represents the potential to emit* for the emissions unit. Therefore, no hourly record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was established by multiplying the rated outlet capacity of 750 horsepower (HP) by an emission factor of 0.000705 lbs OC/HP-hr [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

j. Emission Limitation

0.48 ton OC per rolling, 12-month period

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section d)(3) of the terms and conditions of this permit.

k. Emission Limitation

6.07lbs SO₂/hr

Applicable Compliance Method

The hourly emission limitation represents the potential to emit* for the emissions unit. Therefore, no hourly record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was established by multiplying the rated outlet capacity of 750 horsepower (HP) by an emission factor of 0.00809 lbs SO₂/HP-hr [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and 6 of 40 CFR Part 60, Appendix A.

l. Emission Limitation

5.46 tons SO₂ per rolling, 12-month period

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section d)(3) of the terms and conditions of this permit.



m. Emission Limitation

Visible PE shall not exceed 10% opacity as a 6-minute average, except during start-up and shutdown

Applicable Compliance Method

If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

n. Emission Limitation

0.33 lb PE/hr

Applicable Compliance Method

The hourly emission limitation represents the potential to emit* for the emissions unit. Therefore, no hourly record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was established by multiplying the rated outlet capacity of 750 horsepower (HP) by an emission limitation of 0.062 lbs PE/mmBtu by a conversion factor of 7000 Btu/HP-hr [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval.

o. Emission Limitation

0.062 lb PE per mmBtu of actual heat input

Applicable Compliance Method

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

p. Emission Limitation

0.30 ton PE per rolling, 12-month period

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section d)(3) of the terms and conditions of this permit.

g) Miscellaneous Requirements

- (1) None.