



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Craig W. Butler, Director

12/23/2015

Certified Mail

REX DAVIS
 S H Bell - Stateline Terminal
 2217 MICHIGAN AVE
 EAST LIVERPOOL, OH 43920

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

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

Facility ID: 0215020225
 Permit Number: P0119200
 Permit Type: Renewal
 County: Columbiana

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, The Morning Journal. 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 Ohio EPA DAPC, Northeast District Office
 2110 East Aurora Road
 Twinsburg, OH 44087

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 Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

Michael E. Hopkins, P.E.
 Assistant Chief, Permitting Section, DAPC

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

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The facility handles, processes and stores ferroalloys, refractories and mineral ores. The material arrives from river barges, railcars, and trucks, where it is handled and stored temporarily. The material may be crushed, screened, sorted, blended, dried and repackaged. The facility uses front-end loaders, forklifts, crawler cranes and a large backhoe for cargo loading/unloading.

3. Facility Emissions and Attainment Status:

The facility is located in Columbiana County which is currently in attainment for all criteria pollutants. The facility emits PE, PM10, PM2.5, NOx, SO2, CO, VOCs and HAPs from the material processing/handling and storage operations. The facility wide potential to emit (PTE) for HAPs will be limited below the Title V threshold by federally enforceable limits. The facility requested federally enforceable limits to maintain PTE below the established threshold limits for Title V.

4. Source Emissions:

This is the facilities first full federally enforceable permit to install and operate (FEPTIO). It incorporates the director's final findings and orders (DFFO), permits to install (PTI) and FEPTIO's for other units.

5. Conclusion:

The permit includes federally enforceable limits to maintain chromium emissions below 10 tons per year. The limits requested by the facility are sufficient to reduce the PTE below established Title V thresholds. The affected units are PA Screener (F012), Hammermill Crushing System (P903), Screen Boxes (F009) and KUX Crusher (P001 on the PA side)

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>
PM	261.61
PM10	91.96
Chromium (HAP)	8.91
Manganese (HAP)	7.01
Total HAPs	15.92

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Renewal

S H Bell - Stateline Terminal

2217 MICHIGAN AVE., East Liverpool, OH 43920

ID#:P0119200

Date of Action: 12/23/2015

Permit Desc:Renewal FEPTIO for a facility that handles, processes and stores ferroalloys, refractories and mineral ores..

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 ID # or: Kevin Fortune, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
S H Bell - Stateline Terminal**

Facility ID:	0215020225
Permit Number:	P0119200
Permit Type:	Renewal
Issued:	12/23/2015
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
S H Bell - Stateline Terminal

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Draft Permit-to-Install and Operate

S H Bell - Stateline Terminal

Permit Number: P0119200

Facility ID: 0215020225

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0215020225
Application Number(s): A0052997
Permit Number: P0119200
Permit Description: Renewal FEPTIO for a facility that handles, processes and stores ferroalloys, refractories and mineral ores.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 12/23/2015
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:

S H Bell - Stateline Terminal
2217 MICHIGAN AVE
East Liverpool, OH 43920

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

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



Authorization (continued)

Permit Number: P0119200

Permit Description: Renewal FEPTIO for a facility that handles, processes and stores ferroalloys, refractories and mineral ores.

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

Emissions Unit ID:	F001
Company Equipment ID:	Roadways
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	Storage Piles
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	Material Handling/Internal and Outbound
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F004
Company Equipment ID:	Trico Box Filling Unit
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F005
Company Equipment ID:	Carmen Palletizing Station
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F006
Company Equipment ID:	Area C Crusher-Screener
Superseded Permit Number:	02-13879
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F007
Company Equipment ID:	Area C Screener
Superseded Permit Number:	02-13879
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F008
Company Equipment ID:	North Bag Filling Station
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F009
Company Equipment ID:	Portable scalp screen boxes
Superseded Permit Number:	02-17030
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F011
Company Equipment ID:	East Bag Filling Station
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Emissions Unit ID:	F012
Company Equipment ID:	PA Screener
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F013
Company Equipment ID:	Truck Dump unloading of materials
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F014
Company Equipment ID:	River Barge unloading by crane
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F015
Company Equipment ID:	Railcar unloading of incoming materials
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F016
Company Equipment ID:	Straight sided barge dock unloading
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F017
Company Equipment ID:	Frac Sand Handling - Direct Transfer
Superseded Permit Number:	P0109730
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F018
Company Equipment ID:	Stored FS Loadout
Superseded Permit Number:	P0109730
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P901
Company Equipment ID:	Rotary Dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P902
Company Equipment ID:	OH Side Truck Loadout Shed
Superseded Permit Number:	02-22947
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P903
Company Equipment ID:	Hammermill Crushing System
Superseded Permit Number:	P0108351
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
S H Bell - Stateline Terminal
Permit Number: P0119200
Facility ID: 0215020225
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 Ohio EPA DAPC, Northeast District Office 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
S H Bell - Stateline Terminal
Permit Number: P0119200
Facility ID: 0215020225
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) B.2, B.3, B.4, B.5, B.6, B.7, and B.8
2. Allowable Facility-Wide Emission Limitation
 - a) The total emissions of chromium (Cr) (an individual hazardous air pollutant (HAP)) shall not exceed 8.91 tons per rolling, 12-month period.
3. Operational Restrictions
 - a) None.
4. Monitoring and/or Recordkeeping Requirements
 - a) The permittee shall maintain the following facility-wide information each month:
 - (1) the monthly records of the amount of Cr containing material processed through each emissions unit, in tons;
 - (2) the Cr content of each material processed through each emissions unit, %;
 - (3) total amount of Cr processed through each emissions unit [(1) x (2)];
 - (4) total amount of Cr emitted from each emissions unit in tons/month, based on the emissions factor (AP-42) identified in each emissions unit which is dependent on the type of process being performed;
 - (5) summation of Cr emissions each month from all emissions units; and
 - (6) the rolling, 12-month summation of Cr emissions, current monthly Cr emissions plus the previous 11 months of Cr emissions, in tons.
5. Reporting Requirements
 - a) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.

b) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

(1) the actual rolling, 12-month summation of Cr emissions as specified in B.4.a)(6) was exceeded.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

6. Testing Requirements

a) Compliance with the Emissions Limitations and/or Control Requirements specified in section B.2.a) of these terms and conditions shall be determined in accordance with the following methods:

(1) Emission Limitation:

The total emissions of Cr (an individual hazardous air pollutant (HAP)) shall not exceed 8.91 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.4.a)

7. The term "affected materials" shall mean ferromanganese materials and other materials with a manganese content (raw material, intermediate, or finished product) that are processed or otherwise handled on site in such a manner that could cause the generation of stack or fugitive emissions containing ferromanganese or manganese compounds. Affected materials shall not include materials that contain manganese, such as steel ingots, where the material is not a source of stack or fugitive emissions containing ferromanganese or manganese compounds. Affected materials also shall not include materials that contain chromium.



Draft Permit-to-Install and Operate

S H Bell - Stateline Terminal

Permit Number: P0119200

Facility ID: 0215020225

Effective Date: To be entered upon final issuance

8. The Director's Final Findings and Orders, issued on February 8, 2010 are applicable until such time as the Orders shall terminate when the permittee satisfies all obligations under the Orders certified in writing to the satisfaction of Ohio EPA. Once the Orders terminate, the emission limitations specified in this permit for non-affected materials shall also become applicable to affected materials.



Draft Permit-to-Install and Operate
S H Bell - Stateline Terminal
Permit Number: P0119200
Facility ID: 0215020225
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F001, Roadways

Operations, Property and/or Equipment Description:

Roadways

- 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. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(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. 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
<i>Unpaved Roadways and Parking Areas</i>		
a.	Director's Final Findings and Orders, issued on February 8, 2010.	No visible particulate emissions (PE) except for 3 minutes during any 60-minute period. See b)(2)a.
b.	OAC rule 3745-17-07(B)(5)	*No visible PE except for 13 minutes during any 60-minute period. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the Director's Final Findings and Orders, issued on February 8, 2010 until such time as the Orders shall terminate when the permittee satisfies all obligations under the Orders certified in writing to the satisfaction of Ohio EPA.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
<i>Unpaved Roadways and Parking Areas</i>		
		*All terms with an asterisk shall become applicable if/when the DFFOs are terminated.
c.	OAC rule 3745-17-08(B)	<p>*Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)e through b)(2)i.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the Director's Final Findings and Orders, issued on February 8, 2010 until such time as the Orders shall terminate when the permittee satisfies all obligations under the Orders certified in writing to the satisfaction of Ohio EPA.</p> <p>*All terms with an asterisk shall become applicable if/when the DFFOs are terminated.</p>
<i>Paved Roadways and Parking Areas</i>		
d.	Director's Final Findings and Orders, issued on February 8, 2010.	<p>No visible particulate emissions (PE) except for 1 minute during any 60-minute period.</p> <p>See b)(2)b through b)(2)d.</p>
e.	OAC rule 3745-17-07(B)(4)	<p>*No visible particulate emissions (PE) except for 6 minutes during any 60-minute period.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the Director's Final Findings and Orders, issued on February 8, 2010 until such time as the Orders shall terminate when the permittee satisfies all obligations under the Orders certified in writing to the satisfaction of Ohio EPA.</p> <p>*All terms with an asterisk shall become applicable if/when the DFFOs are terminated.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
<i>Unpaved Roadways and Parking Areas</i>		
f.	OAC rule 3745-17-08(B)	<p>*Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)e through b)(2)i.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the Director's Final Findings and Orders, issued on February 8, 2010 until such time as the Orders shall terminate when the permittee satisfies all obligations under the Orders certified in writing to the satisfaction of Ohio EPA.</p> <p>*All terms with an asterisk shall become applicable if/when the DFFOs are terminated.</p>

(2) Additional Terms and Conditions

- a. The permittee shall apply dust suppressants on all unpaved roads and other unpaved surfaces with vehicle traffic in accordance with the following program, to minimize or eliminate fugitive dust emissions into the ambient air:
 - i. All unpaved roads and other unpaved surfaces with vehicle traffic shall be treated weekly with a chemical dust suppressant (petroleum resin emulsions, asphalt emulsions, acrylic cements, or surfactants), except as provided under Orders b)(2)a.v. and b)(2)a.vi., and g)(1) through g)(4) below.
 - ii. Except as provided in g)(1) through g)(4) below, the dust suppressant application program shall provide for the application of a dust suppressant diluted either (i) in accordance with manufacturer's specifications, if approved by Ohio EPA, or (ii) if no manufacturer's specifications are applicable, by no more than seven (7) parts water to one part chemical. The dust suppressant shall be applied either (i) in accordance with manufacturer's specifications, if approved by Ohio EPA, or (ii) if no manufacturer's specifications are applicable, at a rate of not less than 0.5 gallon per square yard of unpaved road or unpaved surface with vehicle traffic.
 - iii. The permittee shall comply with a visible particulate emission (PE) limitation of no visible emissions, except for a period of 3 minutes for any

60-minute observation period, for the unpaved roads and other unpaved surfaces with vehicle traffic.

- iv. Any unpaved road or other unpaved surface with vehicle traffic that is paved pursuant to these Orders shall comply with the requirements for paved roads and other paved surfaces with vehicle traffic.
 - v. Applications of dust suppressant may be delayed by not more than three (3) days for any scheduled date upon which the unpaved road or other unpaved surface with vehicle traffic is snow and/or ice covered or has experienced greater than or equal to 0.25 inch of rainfall.
 - vi. In the event of persistent adverse weather conditions such as snow and/or ice cover or excessive rainfall, the permittee's records must document the basis for any delay of dust suppressant applications of more than three (3) days beyond the scheduled date.
 - vii. The permittee shall ensure the availability and required scheduling of spray trucks for the dust suppressant application measures on all unpaved roads and other unpaved surfaces with vehicle traffic. The spray trucks shall be designed and equipped, at a minimum, with a spray bar system capable of applying the dust suppressant solution at a coverage rate of at least 1.3 gallons per square yard of surface and a certified flow metering device calibrated in units of gallons per minute. The permittee shall ensure the availability of equipment that will facilitate manual applications of the solution to areas not readily accessible by the spray truck. The permittee may contract with a third party to provide and operate the spray trucks and equipment required by this section.
- b. The permittee shall employ watering and vacuum sweeping measures on all paved roads and other paved surfaces with vehicle traffic (truck routes and berms) in accordance with the following program to minimize or eliminate fugitive dust emissions into the ambient air:
- i. All paved roads and other paved surfaces with vehicle traffic shall be cleaned via watering/vacuum sweeping on a daily basis on each day of plant operation, except as provided under b)(2)b.i.(a), and g)(1) through g)(4).
 - (a) Daily sweeping may be suspended only when there is snow, ice cover, or standing water on the surface.
 - (b) All such suspensions shall be reported and verified as required under e)(3) and e)(4).
 - (c) Irregular paved surfaces that cannot feasibly or adequately be cleaned by vacuum sweeping shall be chemically sprayed in accordance with the provisions of b)(2)a.

- ii. The permittee shall ensure the availability, required scheduling, and proper maintenance of the watering/vacuum sweeping trucks. Respondent may contract with a third party to supply and/or operate the sweeping trucks required by this section.
 - iii. The permittee shall comply with a visible particulate emission limitation of no visible emissions, except for a period of one minute in any 60-minute observation period, for the paved roads and other paved surfaces with vehicle traffic.
 - iv. All outdoor paved roads and other outdoor paved surfaces without vehicle traffic that are accessible by a watering or sweeping truck shall be cleaned by watering/vacuum sweeping on a monthly basis.
- c. The permittee shall continue to prohibit the practice of placing road sweepings from the Stateline Facility on the ground next to the western edge of the property near the East Liverpool Water Plant, in order to control fugitive dust emissions from the road sweepings. The permittee shall place any road sweepings within an enclosure equipped with an operational access door for vehicles transporting materials. This door shall be kept closed except when the road sweepings pile is being added to or removed for disposal. The permittee shall comply with a visible particulate emission limitation of no visible emissions from the enclosure except for a 3-minute average of 5% opacity during the loading and unloading of materials into or out of the enclosure.
- d. The permittee shall continue to maintain signs throughout the facility that limit the speed of all vehicles to 5 miles per hour.
- e. *The permittee shall employ reasonably available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. *The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved and unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- g. *The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.



- h. *Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- i. *Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records relative to the above dust suppressant application program for the unpaved roads and other unpaved surfaces with vehicle traffic. These records shall include, at a minimum, the following information:
 - a. A meteorological log to include average daily temperature, daily precipitation, and unusual meteorological occurrences. The same log may be used to satisfy the requirements of this section and the parallel requirements in d)(2).
 - b. For each dust suppressant application date, and for each unpaved road or other unpaved surface with vehicle traffic, the start and stop times, type of dust suppressant, amount of solution applied, and the dilution ratio of the solution.
 - c. Identification of areas where manual spraying was utilized.
- (2) The permittee shall maintain daily records for the paved road cleaning program. These records shall include, at a minimum, the following information:
 - a. A meteorological log to include average daily temperature, daily precipitation, and unusual meteorological occurrences. The same log may be used to satisfy the requirements of this section and the parallel requirements in d)(1).
 - b. Qualitative description of the road surface conditions.
 - c. Start and stop times and number of passes for each paved road segment.
 - d. Identification of areas where chemical treatment was utilized.
- (3) These records shall be retained by the permittee for five (5) years and shall be made available to the Director or his representative upon request.
- (4) *Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all roads and parking areas	daily



paved roadways and parking areas minimum inspection frequency

all roads and parking areas daily

- (5) *The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- (6) *The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(6)d shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.

- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (3) The permittee shall submit reports quarterly to Ohio EPA. In the reports, the permittee shall summarize the status of compliance with the requirements of b)(2)a and d)(1) above and describe any deviations from the control program, the reasons for such deviations, and the corrective actions taken. The permittee shall certify the reports to be accurate and submit each report within thirty (30) days after the end of each calendar quarter.
 - (4) The permittee shall submit quarterly reports to Ohio EPA. In the reports, the permittee shall summarize the status of compliance with the requirements of b)(2)b and d)(2) above and describe any deviations from the control program, the reasons for such deviations, and the corrective actions taken. The permittee shall certify the reports to be accurate and submit each report within thirty (30) days after the end of each calendar quarter.
 - (5) The permittee shall notify the Director or his representative, in writing, of any noncompliance with b)(2)a and b)(2)b. Such notice shall be submitted within thirty (30) days of the noncompliance occurrence and shall include a detailed explanation of the cause of such noncompliance, all remedial actions required, and the date by which compliance was or will be reestablished.
- 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:

No visible PE from unpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be demonstrated in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").
 - b. Emission Limitation:

No visible PE from paved roadways and parking areas except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be demonstrated in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

c. *Emission Limitation:

No visible PE from unpaved roadways and parking areas except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be demonstrated in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

d. *Emission Limitation:

No visible PE from paved roadways and parking areas except for a period of time not to exceed 6 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be demonstrated in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

- (1) The permittee has the right to petition Ohio EPA for written approval of alternative treatment methods, treatment schedules, and procedures or reporting requirements. No action shall be taken by Respondent in employing the alternative practices until Ohio EPA issues a written approval to the permittee. Such alternative practices must be demonstrated to Ohio EPA to result in equivalent dust control effectiveness.
- (2) In the event that the permittee certifies that the use of any road segment or other surface has been discontinued, the dust suppression or surface cleaning program for that surface may be terminated or reduced. In such case, the permittee shall immediately notify the Director. If the permittee begins to use any new roadway, parking lot or other vehicular activity area, it shall notify the Director and treat or clean the road or other surface in accordance with the procedures contained herein, unless more stringent requirements are specified in any permit to install issued by Ohio EPA for such road or other surface pursuant to OAC Chapter 3745-31.



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- (3) The Director or his representative shall not be precluded from requiring adjustments, including increased chemical suppressant application or cleaning, if on-site inspections reveal that the program contained herein does not prevent significant visible dust surface entrainment and emissions from a particular road segment or other surface.

- (4) In the event that an unpaved road or other unpaved surface with vehicle traffic that has been chemically treated becomes completely hardened and cemented by such treatment so as to become like a paved road as demonstrated by observation, compaction tests, and silt analyses, that road or other surface may be treated as a paved surface and cleaned in accordance with the procedures outlined in b)(2)b.

2. F002, Storage Piles

Operations, Property and/or Equipment Description:

Storage Piles

- 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. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(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. 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.	Director's Final Findings and Orders, issued on February 8, 2010.	Visible fugitive particulate emissions (PE) shall not exceed 5% opacity as a 3-minute average for storage of affected materials from stall-type buildings. See b)(2)a and b)(2)b.
b.	OAC rule 3745-17-07(B)	Visible fugitive PE from this emissions unit shall not exceed 20% opacity as a 3-minute average for storage of non-affected materials within stall-type buildings and warehouse-type storage buildings.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)c through b)(2)e.

(2) Additional Terms and Conditions

- a. The permittee shall continue to store all affected materials in storage buildings whose only openings to the ambient air are through access doors for vehicles transporting materials. These buildings are identified as: MTM1, MTM2, MTM3, MTM4, MTM5, MTM6, MTM9, MTM10, Mays4, the interior of the southern half of Mays3, the interior of the northern half of Mays5, Mays7, Mays10, SHB1, the addition to SHB1, and the Spar building.
- b. The permittee shall not store affected materials in the stall-type storage buildings identified immediately below unless the permittee first installs wood partitioning or the equivalent from the top of the shared rear bin wall to the building roof to isolate both sides of each stall in these buildings used to store affected materials. Further, each stall-type bin used to store affected materials shall also have a rolling door installed to further isolate the individual bin from the ambient air. After the completion of all of these improvements, there shall be no visible emissions of fugitive dust into the ambient air from any stall-type bin in these identified buildings used for the storage of affected materials except that the permittee shall comply with a 5% opacity (3-minute average) visible emission limitation for the fugitive dust emissions to the ambient air during the loading or unloading of affected materials into or from a stall-type bin. Further, the permittee shall provide written notice to OEPA one week prior to use of a stall-type bin for the storage of affected materials. Stall-type buildings are identified as follows: Umbaugh1, Umbaugh2, Mays1, Mays2, the exterior of the northern half of Mays3, the exterior of the southern half of Mays5, Mays6, Mays8, and Mays9. Per June 30, 2010 DFFO Progress Report, S.H. Bell Co. completed the construction of a roof over the aisle between stall-type buildings Mays8 and Mays9, and also completed the installation of wood partitioning down the center wall of both of these buildings. As of June 15, 2010, the remainder of the stall-type buildings no longer store affected materials.
- c. The permittee shall employ reasonably available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to perform the following: (building enclosures for the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
all	daily
 - (2) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
 - (3) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
 - (4) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).
 - (5) The information required in d)(4)d. shall be kept for the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 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. Emissions Limitation:

Visible fugitive PE shall not exceed 5% opacity as a 3-minute average for storage of affected materials from stall-type buildings.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).
 - b. Emission Limitation:

Visible fugitive PE shall not exceed 20% opacity as a 3-minute average for storage of non-affected materials within stall-type buildings and warehouse-type storage buildings.



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Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.

3. F003, Material Handling/Internal and Outbound

Operations, Property and/or Equipment Description:

Material handling, internal transfers and outbound

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. 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.	Director's Final Findings and Orders, issued on February 8, 2010.	Visible fugitive particulate emissions (PE) shall not exceed 5% opacity as a 3-minute average when handling affected materials. See b)(2)a through b)(2)d.
b.	OAC rule 3745-17-07(B)	Visible fugitive PE from this emissions unit shall not exceed 20% opacity as a 3-minute average when handling non-affected materials.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)e through b)(2)h.

(2) Additional Terms and Conditions

- a. The permittee shall ensure that all bulk affected materials (i.e., excluding packaged materials) loaded out shall only be loaded out at the truck loadout sheds, which are equipped with capture and baghouse control systems.
- b. The permittee shall ensure the tarping of each truck containing affected materials for transferring any dusty material in and out of the facility, to minimize or eliminate emissions of fugitive dust into the ambient air. There shall be no visible emissions of fugitive dust into the ambient air from the tarped trucks. In addition the permittee shall use all reasonable measures to ensure incoming trucks are tarped (e.g., notice to the driver, hauling contractor, and/or owner of materials shipped to the facility).
- c. The permittee shall promptly replace any missing, defective, or damaged hanging strips at material load-in points at material processing operations to minimize or eliminate emissions of fugitive dust into the ambient air. Such hanging strips shall continue to be maintained in proper condition.
- d. The permittee shall not be required to operate a wet suppression system if the permittee demonstrates to the Director's satisfaction that ambient temperatures significantly below freezing conditions and other weather conditions render the operation of the system technically infeasible or inoperable, even with the use of heat tracing for the water supply, pump, and piping. During periods of shutdown, the permittee shall make all reasonable efforts to minimize or eliminate the processing of affected materials at any emissions unit that will not be adequately controlled.

If it is determined that the shutdown of a wet suppression system has caused elevated ambient concentrations of manganese at any of the monitoring sites in East Liverpool, the Director will so notify the permittee; and, thereafter, the permittee shall prohibit the processing of affected materials in any emissions unit that cannot be adequately controlled due to ambient temperature conditions.

- e. The permittee has committed to employ the following control measures for this emissions unit for purposes of ensuring compliance with the above-mentioned applicable requirements:

Material Handling/Processing Operation	Control Measures
loading and unloading	reduced drop height, wet application for non-affected materials, loadout shed for outbound trucks not using Loadout O, as necessary [^]
transfer and conveying	partial and/or total enclosures, wet application, as necessary [^]



^ If at any time the moisture content of the material processed or handled is not sufficient to meet the above applicable requirements, the permittee shall employ a wet suppression control system to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- f. For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measures is unnecessary.
- g. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- h. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The loadout 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) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
All Operations	Daily

- (2) The permittee shall maintain records of the dates and durations when a wet suppression system was not operated to control the emissions of affected materials due to extremely low ambient temperatures. These records shall clearly document the reason(s) for the shutdown of the system. In addition, the permittee's efforts to minimize or eliminate the processing of affected materials during periods of shutdown shall also be described in detail in these records.
- (3) The permittee also shall maintain a meteorological log that includes average hourly temperature, daily precipitation, and unusual meteorological occurrences. The same log may be used to satisfy the requirements of C.1.d)(1) and C.1.d)(2).

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points 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 emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

- (5) The permittee shall inspect the water spray system on a weekly basis to determine the operating condition of the spray nozzles, waterlines, pumps, etc. A log shall be kept which records the condition of the equipment and any maintenance activity.
- (6) 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 control measures;
 - c. the dates and control measures that were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented.
- (7) The above-mentioned inspections shall be performed during representative, normal operating conditions.

- (8) The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each day when the water spray system was not operating in accordance to the terms and conditions for this emissions unit.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(4) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

- b. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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 fugitive PE shall not exceed 5% opacity as a 3-minute average when handling affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

- b. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average when handling non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.



4. F004, Trico Box Filling Unit

Operations, Property and/or Equipment Description:

Trico Box Filling Unit

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. 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.	Director's Final Findings and Orders, issued on February 8, 2010.	See c)(1).
b.	OAC rule 3745-31-05(A)(3)	The baghouse serving this emissions unit shall achieve an outlet emission rate of not greater than 0.02 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases. No visible PE of fugitive dust at the points of capture. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08.
c.	OAC rule 3745-17-07(A)	Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)a and b)(2)b.
e.	OAC rule 3745-17-07(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The moisture content and the drop height of the material being processed at this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust.
- b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The permittee shall not process materials that contain ferromanganese and other materials with a manganese content (raw material, intermediate, or finished product) that are processed or otherwise handled on site in such a manner that could cause the generation of stack or fugitive emissions containing ferromanganese or manganese compounds in this emissions unit.
- (2) 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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 6.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the

cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit as well as at the material transfer points located outside of the building. 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.

(4) The permittee shall maintain the following records on a monthly basis:

- a. the type (i.e. ferromanganese/affected materials) and amount of material processed at this emissions unit.

e) Reporting Requirements

(1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.

(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.

- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
 - f. an identification of any month when any affected materials were processed in this emissions unit as specified in c)(1); and
 - g. the actual throughput of affected materials processed.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

PE shall not exceed 0.02 gr/dscf.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitation:

No visible PE of fugitive dust at the points of capture.

Applicable Compliance Method:

If required, compliance with the visible PE limitations for the boxing units identified above shall be demonstrated in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

c. Emission Limitation:

Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.



5. F005, Carmen Palletizing Station

Operations, Property and/or Equipment Description:

Carmen Palletizing 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. None.

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

a. None.

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.	Director's Final Findings and Orders, issued on February 8, 2010.	<p>Visible fugitive particulate emissions (PE) shall not exceed 5% opacity as a 3-minute average from the National Drawn Building when the hopper is charged with affected materials.</p> <p>The baghouse serving this emissions unit shall achieve an outlet emission rate of not greater than 0.01 grain of PE per dry standard cubic foot of exhaust gases when the hopper is charged with affected materials.</p> <p>No visible PE from the exhaust stack serving this emissions unit when the hopper is charged with affected materials.</p> <p>See b)(2)a and b)(2)b.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)	<p>The baghouse serving this emissions unit shall achieve an outlet emission rate of not greater than 0.02 grain of PE per dry standard cubic foot of exhaust gases when the hopper is charged with non-affected materials.</p> <p>No visible PE of fugitive dust at the points of capture when the hopper is charged with non-affected materials.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08.</p> <p>See b)(2)c and b)(2)d.</p>
c.	OAC rule 3745-17-07(A)	Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule when the hopper is charged with non-affected materials.
d.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall maintain the loader tunnels around the hopper openings and ramp areas located at the Carmen palletizing station. The loader tunnel for the Carmen palletizing station shall be approximately 20 feet wide, 16 feet long, and 22 feet tall. PVC strips shall be installed in the open end of each loader tunnel.
- b. The permittee shall install and operate a capture system and baghouse for the control of fugitive dust generated at the dump hoppers associated with the Carmen palletizing station when the hoppers are charged with affected materials. The capture system shall be designed to minimize or eliminate any visible emissions of fugitive dust from the dump hoppers when the hoppers are charged with affected materials; and after installation, the capture system shall be operated and maintained in a manner that will ensure compliance with a 5% opacity (3-minute average) visible emissions limitation for the fugitive dust emissions from the National Drawn Building that are caused by these emissions. The baghouse shall be designed to achieve a controlled emission rate of 0.010 grain of particulate emissions/dscf and no visible particulate emissions from the outlet of the control device.

- c. The moisture content and the drop height of the material being processed at this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 6.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit as well as at the material transfer points located outside of the building. 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.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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 fugitive PE shall not exceed 5% opacity as a 3-minute average from the National Drawn Building when the hopper is charged with affected materials.
Applicable Compliance Method:
If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
 - b. Emission Limitation:
PE shall not exceed 0.01 gr/dscf when the hopper is charged with affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

No visible PE from the exhaust stack serving this emissions unit when the hopper is charged with affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

d. Emission Limitation:

PE shall not exceed 0.02 gr/dscf when the hopper is charged with non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

e. Emission Limitation:

No visible PE of fugitive dust at the points of capture when the hopper is charged with non-affected materials.

Applicable Compliance Method:

If required, compliance with the visible PE limitations for the boxing units identified above shall be demonstrated in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

f. Emission Limitation:

Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule when the hopper is charged with non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.



Draft Permit-to-Install and Operate

S H Bell - Stateline Terminal

Permit Number: P0119200

Facility ID: 0215020225

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



6. F006, Area C Crusher-Screener

Operations, Property and/or Equipment Description:

Area C Crusher/Screener equipped with a water spray system

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. 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.	Director's Final Findings and Orders, issued on February 8, 2010.	<p>Visible fugitive particulate emissions (PE) shall not exceed 5% opacity as a 3-minute average from the Area C crusher-screener building when handling and processing affected materials.</p> <p>The baghouse serving this emissions unit shall achieve an outlet emission rate of not greater than 0.01 grain of PE per dry standard cubic foot of exhaust gases when handling and processing affected materials.</p> <p>No visible PE from the exhaust stack serving this emissions unit when handling and processing affected materials.</p> <p>See b)(2)a through b)(2)c.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)	PE shall not exceed 3.13 tpy. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 and OAC rule 3745-17-08.
c.	OAC rule 3745-17-07(A)	Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule when handling and processing non-affected materials.
d.	OAC rule 3745-17-07(B)	Visible fugitive PE from this emissions unit shall not exceed 20% opacity as a 3-minute average when handling and processing non-affected materials.
e.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)d and b)(2)e.

(2) Additional Terms and Conditions

- a. The permittee shall maintain the loader tunnel on the northern side of the central Area C building for the dump hopper associated with the Area C crusher - screener. The loader tunnel shall have a roof that is approximately 16 feet by 28 feet in size, with side walls, and PVC strips in the entrance to the loader tunnel.
- b. The permittee shall maintain the seals on the Area C building enclosures by maintaining the following modifications:
 - i. for the Area C main building, close in the gaps around the conveyors by maintaining metal on the bottoms and double vinyl strips on the tops, maintain vinyl around the doors, and maintain a removable panel next to the moveable conveyor; and
 - ii. for the crusher - screener building, maintain the siding, bolt closed and seal the doors on the north side of the building (i.e., make the sliding doors permanent), seal all doors with vinyl strip material, maintain vinyl strip material on the bottoms of the bin doors, and seal around the conveyor.
- c. The permittee shall install and operate a capture system and baghouse to control the fugitive dust emissions from the charging of affected materials in the dump hoppers associated with the Area C crusher-screener and to further control the fugitive dust emissions generated by the handling and processing of affected

materials within the buildings serving the Area C crusher - screener. The emission control system shall be designed to minimize or eliminate the visible emissions of fugitive dust that occur within the buildings during the handling and processing of affected materials. In addition, the baghouse shall be designed to achieve a controlled emission rate of 0.010 grain of particulate emissions/dscf and no visible particulate emissions from the outlet of the control device. After the installation of this emission control system, the permittee shall operate and maintain the emission control system in a manner that will ensure compliance with a 5% opacity (3-minute average) visible emissions limitation applicable outside the buildings for the fugitive dust emissions created from the handling or processing of affected materials inside the buildings serving the Area C crusher - screener.

- d. The permittee shall minimize or eliminate visible PE of fugitive dust by employing reasonably available control measures for this emissions unit for the purpose of ensuring compliance with the above mentioned applicable requirements. These measures shall include, but not be limited to, the following:
 - i. the installation and use of hoods, fans and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust;
 - ii. the collection efficiency is sufficient to minimize or eliminate visible PE of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and
 - iii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible particulate emissions from the exhaust stack(s), whichever is less stringent.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 6.0 inches of water.

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during

future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and 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 color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.

- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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 fugitive PE shall not exceed 5% opacity as a 3-minute average from the Area C Crusher-Screener Building when handling and processing affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

PE shall not exceed 0.01 gr/dscf when handling and processing affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

No visible PE from the exhaust stack serving this emissions unit when handling and processing affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

d. Emission Limitation:

PE shall not exceed 3.13 tpy.



Applicable Compliance Method:

Compliance with the allowable annual particulate emissions rate shall be demonstrated using emission factors outlined in AP-42 (Fifth Edition, 1995), Section 11.19.2 (Crushed Stone Processing) and Section 13.2.4 (Aggregate Handling and Storage Piles) using the following equation:

$$E^a \text{ (tpy)} = EF * AP * (1 - CE/100) / 2000 \text{ lbs/ton}$$

where:

E^a = this equation should be used for the crusher, screener and each transfer point, thus "E" equals the sum of each emission points mentioned above;

EF = emission factors (0.0007 (crusher), 0.025 (screener), 0.0030 (TP#2-#5, #7, #8 and #11) and 0.0011 (TP#1, #6, #9, #10 and #12) lb PM / ton of material processed);

AP = maximum annual production rate (per application 1.752 (crusher, screener and TP#1-#7) and 0.584 (TP#8-#12) million tons);

CE = control efficiency of the baghouse (per application 91.9% and 97.9% (only TP#1)); and

2000 = conversion factor, pounds per ton.

e. Emission Limitation:

Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule when handling and processing non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

f. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average when handling and processing non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).



Draft Permit-to-Install and Operate

S H Bell - Stateline Terminal

Permit Number: P0119200

Facility ID: 0215020225

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



7. F007, Area C Screener

Operations, Property and/or Equipment Description:

Area C Screener equipped with a water spray system

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. 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.	Director's Final Findings and Orders, issued on February 8, 2010.	<p>Visible fugitive particulate emissions (PE) shall not exceed 5% opacity as a 3-minute average from the Area C screener building when handling and processing affected materials.</p> <p>The baghouse serving this emissions unit shall achieve an outlet emission rate of not greater than 0.01 grain of PE per dry standard cubic foot of exhaust gases when handling and processing affected materials.</p> <p>No visible PE from the exhaust stack serving this emissions unit when handling and processing affected materials.</p> <p>See b)(2)a through b)(2)c.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)	PE shall not exceed 2.87 tpy. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 and OAC rule 3745-17-08.
c.	OAC rule 3745-17-07(A)	Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule when handling and processing non-affected materials.
d.	OAC rule 3745-17-07(B)	Visible fugitive PE from this emissions unit shall not exceed 20% opacity as a 3-minute average when handling and processing non-affected materials.
e.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)d and b)(2)e.

(2) Additional Terms and Conditions

- a. The permittee shall maintain the loader tunnel on the northern side of the central Area C building for the dump hoppers associated with the Area C screener. The loader tunnel shall have a roof that is approximately 16 feet by 28 feet in size, with side walls, and PVC strips in the entrance to the loader tunnel.
- b. The permittee shall maintain the seals on the Area C building enclosures by maintaining the following modifications:
 - i. for the Area C main building, close in the gaps around the conveyors by maintaining metal on the bottoms and double vinyl strips on the tops, maintain vinyl around the doors, and maintain a removable panel next to the moveable conveyor; and
 - ii. for the screener building, maintain the siding, bolt closed and seal the doors on the north side of the building (i.e., make the sliding doors permanent), seal all doors with vinyl strip material, maintain vinyl strip material on the bottoms of the bin doors, and seal around the conveyor
- c. The permittee shall install and operate a capture system and baghouse to control the fugitive dust emissions from the charging of affected materials in the dump hoppers associated with the Area C screener and to further control the fugitive dust emissions generated by the handling and processing of affected materials within the buildings serving the Area C screener. The emission control system

shall be designed to minimize or eliminate the visible emissions of fugitive dust that occur within the buildings during the handling and processing of affected materials. In addition, the baghouse shall be designed to achieve a controlled emission rate of 0.010 grain of particulate emissions/dscf and no visible particulate emissions from the outlet of the control device. After the installation of this emission control system, the permittee shall operate and maintain the emission control system in a manner that will ensure compliance with a 5% opacity (3-minute average) visible emissions limitation applicable outside the buildings for the fugitive dust emissions created from the handling or processing of affected materials inside the buildings serving the Area C screener.

d. The permittee shall minimize or eliminate visible PE of fugitive dust by employing reasonably available control measures for this emissions unit for the purpose of ensuring compliance with the above mentioned applicable requirements. These measures shall include, but not be limited to, the following:

- i. the installation and use of hoods, fans and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust;
- ii. the collection efficiency is sufficient to minimize or eliminate visible PE of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and
- iii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible particulate emissions from the exhaust stack(s), whichever is less stringent.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 6.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The

permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit

will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and 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 color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.

- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall

indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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 fugitive PE shall not exceed 5% opacity as a 3-minute average from the Area C Screener Building when handling and processing affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

PE shall not exceed 0.01 gr/dscf when handling and processing affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

No visible PE from the exhaust stack serving this emissions unit when handling and processing affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

d. Emission Limitation:

PE shall not exceed 2.87 tpy.

Applicable Compliance Method:

Compliance with the allowable annual particulate emissions rate shall be demonstrated using emission factors outlined in AP-42 (Fifth Edition, 1995),



Section 11.19.2 (Crushed Stone Processing) and Section 13.2.4 (Aggregate Handling and Storage Piles) using the following equation:

$$E^a \text{ (tpy)} = EF * AP * (1 - CE/100) / 2000 \text{ lbs/ton}$$

where:

E^a = this equation should be used for the screener and each transfer point, thus "E" equals the sum of each emission points mentioned above;

EF = emission factors (0.025 (screener), 0.0030 (TP#2-#5, #7, #9, #10 and #13) and 0.0011 (TP#1, #6, #8, #11, #12 and #14) lb PM / ton of material processed);

AP = maximum annual production rate (per application 1.752 (screener and TP#1, #3, #4, #7 and #9) and 0.584 (TP#10-#14) million tons);

CE = control efficiency of the baghouse (per application 91.9% and 97.9% (only TP#1)); and

2000 = conversion factor, pounds per ton.

e. Emission Limitation:

Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule when handling and processing non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

f. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average when handling and processing non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.



8. F008, North Bag Filling Station

Operations, Property and/or Equipment Description:

North Bag 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. None.

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

a. None.

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.	Director's Final Findings and Orders, issued on February 8, 2010.	<p>Visible fugitive particulate emissions (PE) shall not exceed 5% opacity as a 3-minute average from the National Drawn Building when handling affected materials.</p> <p>The baghouse serving this emissions unit shall achieve an outlet emission rate of not greater than 0.01 grain of PE per dry standard cubic foot of exhaust gases when handling affected materials.</p> <p>No visible PE from the exhaust stack serving this emissions unit when handling affected materials.</p> <p>See b)(2)a and b)(2)b. \</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)	Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule when handling non-affected materials.
c.	OAC rule 3745-17-07(B)	Visible fugitive PE from this emissions unit shall not exceed 20% opacity as a 3-minute average when handling non-affected materials.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)c through b)(2)e.

(2) Additional Terms and Conditions

- a. The permittee shall maintain the loader tunnel around the hopper openings and ramp areas located at the north bag filling station. The loader tunnel for the north bag filling station shall be approximately 14 feet wide, 16 feet long, and 22 feet tall. PVC strips shall be installed in the open end of each loader tunnel.
- b. The permittee shall install and operate a capture system and baghouse for the control of fugitive dust generated at the dump hoppers associated with the north bag filling station when the hoppers are charged with affected materials. The capture system shall be designed to minimize or eliminate any visible emissions of fugitive dust from the dump hoppers when the hoppers are charged with affected materials; and after installation, the capture system shall be operated and maintained in a manner that will ensure compliance with a 5% opacity (3-minute average) visible emissions limitation for the fugitive dust emissions from the National Drawn Building that are caused by these emissions. The baghouse shall be designed to achieve a controlled emission rate of 0.010 grain of particulate emissions/dscf and no visible particulate emissions from the outlet of the control device.
- c. The permittee shall minimize or eliminate visible PE of fugitive dust by employing reasonably available control measures for this emissions unit for the purpose of ensuring compliance with the above mentioned applicable requirements. These measures shall include, but not be limited to, the following:
 - i. the installation and use of hoods, fans and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust;
 - ii. the collection efficiency is sufficient to minimize or eliminate visible PE of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and



- iii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible particulate emissions from the exhaust stack(s), whichever is less stringent.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- d. The moisture content and the drop height of the material being processed at this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 6.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and 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 color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

- d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the “Additional Information and Corrections” section of the PER that no visible emissions were observed and no corrective actions were taken.

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 fugitive PE shall not exceed 5% opacity as a 3-minute average from the National Drawn Building when handling affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

PE shall not exceed 0.01 gr/dscf when handling affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

No visible PE from the exhaust stack serving this emissions unit when handling affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

d. Emission Limitation:

Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule when handling non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

e. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average when handling non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.

9. F009, Portable scalp screen boxes

Operations, Property and/or Equipment Description:

Portable scalp screen boxes

- 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 and c)(1)
- 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.	Director's Final Findings and Orders, issued on February 8, 2010.	Visible fugitive particulate emissions (PE) shall not exceed 5% opacity as a 3-minute average when handling affected materials. See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(D)(1)(b)	See B.2 through B.6 and c)(1).
c.	OAC rule 3745-31-05(A)(3)	PE shall not exceed 13.44 tpy. Visible PE of fugitive dust shall not exceed 10% opacity, as a 3-minute average when handling non-affected materials. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)c through b)(2)e.
e.	OAC rule 3745-17-07(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall continue to employ the screen boxes only within full building enclosures.
- b. The permittee shall operate a mobile, wet suppression system with impingement and/or fogging spray nozzles to control the fugitive dust emissions from the screen boxes. The permittee shall operate and maintain the wet suppression or equivalent emission control system, in a manner that will ensure compliance with a 5% opacity (3-minute average) visible emissions limitation for the fugitive dust emissions from the screening of affected materials that are emanating from the full building enclosure(s) housing the screen boxes.
- c. The moisture content and the drop height of the material being processed at this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust.
- d. The control efficiency of the water spray system for this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust. The permittee shall maintain the water spray in good operating condition at all times. The visible emissions of fugitive dust shall be determined by observation of building openings (doors, windows, etc.).
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The maximum chromium-containing materials processed through this emissions unit shall not exceed 100,000 tons per rolling, 12-month period (combined for Ohio and Pennsylvania).
- (2) A water spray system shall be employed while this emissions unit is in operation. The water spray system shall be kept in good operating conditions at all times.

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

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

- (2) The permittee shall inspect the water spray system on a weekly basis to determine the operating condition of the spray nozzles, waterlines, pumps, etc. A log shall be kept which records the condition of the equipment and any maintenance activity.
- (3) The permittee shall maintain the following records on a monthly basis:
 - a. the type (i.e. chromium-containing materials) and amount of material processed at this emissions unit.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.

- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of any month when any of the rolling, 12-month throughput limitation as specified in c)(1) was exceeded;
 - b. the actual throughput for the limitation that was exceeded; and
 - c. each day when the water spray system was not operating in accordance to the terms and conditions for this emissions unit.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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 fugitive PE shall not exceed 5% opacity as a 3-minute average when handling affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

PE shall not exceed 13.44 tpy.

Applicable Compliance Method:

Compliance with the allowable annual particulate emissions rate shall be demonstrated using emission factors outlined in AP-42 (Fifth Edition, 1995), Section 11.19.2 (Crushed Stone Processing) using the following equation:

$$E^a \text{ (tpy)} = EF * AP * (1 - CE/100) / 2000 \text{ lbs/ton}$$

where:

E^a = this equation should be used for the front-end loader and two passes through the screen boxes, thus "E" equals the sum of each emission points mentioned above;

EF = emission factors (0.0011 (front-end loader), 0.025 (screening, first pass) and 0.025 (screening, second pass) lb PM / ton of material processed);

AP = maximum annual production rate (per application 1.314 (front-end loader and screening first and second pass) million tons);

CE = control efficiency of the building (per application 60%); and

2000 = conversion factor, pounds per ton.

c. Emission Limitation:

Visible PE of fugitive dust shall not exceed 10% opacity, as a 3-minute average when handling non-affected materials.



Draft Permit-to-Install and Operate

S H Bell - Stateline Terminal

Permit Number: P0119200

Facility ID: 0215020225

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.



10. F011, East Bag Filling Station

Operations, Property and/or Equipment Description:

East Bag 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. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- 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.	Director's Final Findings and Orders, issued on February 8, 2010.	See c)(1).
b.	OAC rule 3745-31-05(A)(3)	The baghouse serving this emissions unit shall achieve an outlet emission rate of not greater than 0.02 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases. Visible PE from the exhaust stack serving this emissions unit shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 and OAC rule 3745-17-08.
c.	OAC rule 3745-17-07(B)	Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)a and b)(2)b.
e.	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The moisture content and the drop height of the material being processed at this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust.
- b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The permittee shall not process materials that contain ferromanganese and other materials with a manganese content (raw material, intermediate, or finished product) that are processed or otherwise handled on site in such a manner that could cause the generation of stack or fugitive emissions containing ferromanganese or manganese compounds in this emissions unit.
- (2) 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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 6.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the

cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and 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 color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

(4) The permittee shall maintain the following records on a monthly basis:

- a. the type (i.e. ferromanganese/affected materials) and amount of material processed at this emissions unit.

e) Reporting Requirements

(1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.

(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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
 - f. an identification of any month when any affected materials were processed in this emissions unit as specified in c)(1); and
 - g. the actual throughput of affected materials processed.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

PE shall not exceed 0.02 gr/dscf.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitation:

Visible PE from the exhaust stack serving this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

c. Emission Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.



11. F012, PA Screener

Operations, Property and/or Equipment Description:

PA Screener

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 and c)(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
a.	Director's Final Findings and Orders, issued on February 8, 2010.	See c)(1).
b.	OAC rule 3745-31-05(D)(1)(b)	See B.2 through B.6 and c)(2).
c.	OAC rule 3745-17-07(B)	Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)a and b)(2)b.

(2) Additional Terms and Conditions

a. The moisture content and the drop height of the material being processed at this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust.

- b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The permittee shall not process materials that contain ferromanganese and other materials with a manganese content (raw material, intermediate, or finished product) that are processed or otherwise handled on site in such a manner that could cause the generation of stack or fugitive emissions containing ferromanganese or manganese compounds in this emissions unit.
- (2) The permittee shall not process materials that contain chromium through this emissions unit.

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

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

- (2) The permittee shall maintain the following records on a monthly basis:
 - a. the type (i.e. ferrochromium and ferromanganese/affected materials) and amount of material processed at this emissions unit.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of any month when any affected materials or chromium-containing materials were processed in this emissions unit as specified in c)(1) and c)(2); and
 - b. the actual throughput of affected materials processed.If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).
- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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 fugitive PE shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.

12. F013, Truck Dump unloading of materials

Operations, Property and/or Equipment Description:

Truck Dump unloading of materials

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. 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.	Director's Final Findings and Orders, issued on February 8, 2010.	Visible fugitive particulate emissions (PE) shall not exceed 5% opacity as a 3-minute average when handling affected materials. See b)(2)a and b)(2)b.
b.	OAC rule 3745-17-07(B)	Visible fugitive PE from this emissions unit shall not exceed 20% opacity as a 3-minute average when handling non-affected materials.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)c and b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee shall install a building enclosure for an affected materials truck dump unloading location connected to the Pennsylvania truck loadout. This enclosure shall be approximately 22 feet wide, 24 feet long, and 30 feet high and PVC strips shall be installed in the open end of each enclosure.
- b. The new building enclosure shall be connected to, and emissions of affected materials from unloading shall be controlled by, the baghouse currently controlling emissions from the Pennsylvania truck loadout. The permittee shall operate and maintain the emission control system in a manner that will ensure compliance with a 5% opacity (3-minute average) visible emission limitation for the fugitive dust emissions during the unloading of affected materials.
- c. The moisture content and the drop height of the material being processed at this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:



Draft Permit-to-Install and Operate

S H Bell - Stateline Terminal

Permit Number: P0119200

Facility ID: 0215020225

Effective Date: To be entered upon final issuance

a. Emission Limitation:

Visible fugitive PE shall not exceed 5% opacity, as a 3-minute average when handling affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

b. Emission Limitation:

Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average when handling non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.

13. F014, River Barge unloading by crane

Operations, Property and/or Equipment Description:

River Barge unloading by crane

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. 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.	Director's Final Findings and Orders, issued on February 8, 2010.	See c)(1).
b.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 5.99 tpy. Visible fugitive PE shall not exceed 10% opacity, as a 3-minute average. See b)(2)a.
c.	OAC rule 3745-17-07(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)a and b)(2)b.

(2) Additional Terms and Conditions

- a. The moisture content and the drop height of the material being processed at this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust.
- b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) The permittee shall not process materials that contain ferromanganese and other materials with a manganese content (raw material, intermediate, or finished product) that are processed or otherwise handled on site in such a manner that could cause the generation of stack or fugitive emissions containing ferromanganese or manganese compounds that are not packaged in this emissions unit.

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

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

- (2) The permittee shall maintain the following records on a monthly basis:
 - a. the type (i.e. ferromanganese/affected materials) and amount of material processed at this emissions unit.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of any month when any affected materials were processed in this emissions unit as specified in c)(1); and
 - b. the actual throughput of affected materials processed.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:



- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

PE shall not exceed 5.99 tpy.

Applicable Compliance Method:

Compliance with the allowable annual particulate emissions rate shall be demonstrated using an emission factor outlined in AP-42 (Fifth Edition, 1995), Section 13.2.4 (Aggregate Handling and Storage Piles) using the following equation:

$$E^a \text{ (tpy)} = EF * AP * (1 - CE/100) / 2000 \text{ lbs/ton}$$

where:

E^a = this equation should be used for TP#1-5, thus "E" equals the sum of each emission points mentioned above;

EF = emission factor (0.0011 (TP#1-#5) lb PM / ton of material processed);

AP = maximum annual production rate (per application 2.9127 (TP#1-#5) million tons);

CE = control efficiency of the building (per application 41.4% (only for TP#3)); and

2000 = conversion factor, pounds per ton.

- b. Emission Limitation:

Visible PE of fugitive dust shall not exceed 10% opacity, as a 3-minute average.



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S H Bell - Stateline Terminal

Permit Number: P0119200

Facility ID: 0215020225

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.



14. F015, Railcar unloading of incoming materials

Operations, Property and/or Equipment Description:

Railcar unloading of incoming materials

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. 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.	Director's Final Findings and Orders, issued on February 8, 2010.	Visible fugitive particulate emissions (PE) shall not exceed 5% opacity as a 3-minute average when handling affected materials. See b)(2)a and b)(2)b.
b.	OAC rule 3745-17-07(B)	Visible fugitive PE from this emissions unit shall not exceed 20% opacity as a 3-minute average when handling non-affected materials.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)c and b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee shall operate a mobile, wet suppression system with impingement and/or fogging spray nozzles to control the fugitive dust emissions from the loading and unloading of hopper cars. The permittee shall operate and maintain the wet suppression or equivalent emission control system, on or before February 15, 2010 in a manner that will ensure compliance with a 5% opacity (3-minute average) visible emissions limitation for the fugitive dust emissions either from the dryer building (that are due to railcar unloading) or from the building enclosure for the railcar unloading during the loading or unloading of affected materials to hopper cars.
- b. The permittee shall neither load nor unload affected materials from gondola cars or boxcars along the railspur adjacent to the hopper pit without operating and maintaining a wet suppression system (either fixed or mobile). The permittee shall operate and maintain the wet suppression system in a manner that will ensure compliance with a 5% opacity (3-minute average) visible emissions limitation for the fugitive dust emissions during the loading or unloading of affected materials from gondola cars or boxcars.
- c. The control efficiency of the water spray system for this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust. The permittee shall maintain the water spray in good operating condition at all times. The visible emissions of fugitive dust shall be determined by observation of building openings (doors, windows, etc.).
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) A water spray system shall be employed while this emissions unit is in operation when unloading affected materials. The water spray system shall be kept in good operating conditions at all times.

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 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 color of the emissions;
 - b. whether the emissions are representative of normal operations;

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

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

- (2) The permittee shall inspect the water spray system on a weekly basis to determine the operating condition of the spray nozzles, waterlines, pumps, etc. A log shall be kept which records the condition of the equipment and any maintenance activity.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each day when the water spray system was not operating in accordance to the terms and conditions for this emissions unit.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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 fugitive PE shall not exceed 5% opacity, as a 3-minute average when handling affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

b. Emission Limitation:

Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average when handling non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and



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S H Bell - Stateline Terminal

Permit Number: P0119200

Facility ID: 0215020225

Effective Date: To be entered upon final issuance

procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.

15. F016, Straight sided barge dock unloading

Operations, Property and/or Equipment Description:

Straight sided barge dock unloading

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. 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.	Director's Final Findings and Orders, issued on February 8, 2010.	Visible fugitive particulate emissions (PE) shall not exceed 10% opacity as a 3-minute average when handling affected materials. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)	PE shall not exceed 5.99 tpy. Visible fugitive PE shall not exceed 10% opacity as a 3-minute average when handling non-affected materials. See b)(2)b.
c.	OAC rule 3745-17-07(B)	The emission limitation required by this applicable 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
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)b and b)(2)c.

(2) Additional Terms and Conditions

- a. The permittee shall operate a mobile, wet suppression system with impingement and/or fogging spray nozzles for the control of the fugitive dust emissions from the unloading of river barges and the loading of trucks by a hydraulic excavator. The permittee shall operate and maintain a wet suppression system in a manner that will minimize or eliminate visible emissions of fugitive dust from affected materials during the barge unloading and loading and truck loading operations and comply with a 10% opacity (3-minute average) visible emission limitation for the fugitive dust emissions during the loading and unloading of affected materials.
- b. The control efficiency of the water spray system for this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust. The permittee shall maintain the water spray in good operating condition at all times. The visible emissions of fugitive dust shall be determined by observation of building openings (doors, windows, etc.).
- c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) A water spray system shall be employed while this emissions unit is in operation when unloading affected materials. The water spray system shall be kept in good operating conditions at all times.

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 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 color of the emissions;
 - b. whether the emissions are representative of normal operations;

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

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

- (2) The permittee shall inspect the water spray system on a weekly basis to determine the operating condition of the spray nozzles, waterlines, pumps, etc. A log shall be kept which records the condition of the equipment and any maintenance activity.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each day when the water spray system was not operating in accordance to the terms and conditions for this emissions unit.



If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

PE shall not exceed 5.99 tpy.

Applicable Compliance Method:

Compliance with the allowable annual particulate emissions rate shall be demonstrated using an emission factor outlined in AP-42 (Fifth Edition, 1995), Section 13.2.4 (Aggregate Handling and Storage Piles) using the following equation:

$$E^a \text{ (tpy)} = EF * AP * (1 - CE/100) / 2000 \text{ lbs/ton}$$

where:

E^a= this equation should be used for barge unloading (TP#1 & #2) and barge loading (TP#1 & #2), thus "E" equals the sum of each emission points mentioned above;

EF = emission factor (0.0011 (TP#1 & #2 for both barge unloading & loading) lb PM / ton of material processed);



AP = maximum annual production rate (per application 2.9127 (TP#1-#2 for loading & unloading) million tons);

CE = control efficiency of the building (per application 41.4% (only for TP#2 when unloading)); and

2000 = conversion factor, pounds per ton.

b. Emission Limitation:

Visible fugitive PE shall not exceed 10% opacity, as a 3-minute average when handling affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

Visible fugitive PE shall not exceed 10% opacity, as a 3-minute average when handling non-affected materials.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.

16. F017, Frac Sand Handling - Direct Transfer

Operations, Property and/or Equipment Description:

Frac Sand Handling-Direct Transfer with 1200 acfm fabric filter/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. 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) November 30, 2001	Particulate emissions (PE) shall not exceed 6.40 tons per year. PE from the fabric filter/baghouse shall not exceed 0.02 grain/dry standard cubic foot of exhaust. Particulate matter emissions equal to or less than 10 microns in diameter (PM ₁₀) shall not exceed 3.00 tons per year. Particulate matter emissions equal to or less than 2.5 microns in diameter (PM _{2.5}) shall not exceed 0.46 ton per year. See b)(2)d and c)(1).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii) December 1, 2006	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, PM ₁₀ and PM _{2.5} emissions from these air contaminant sources since the potential to emit is less than 10 tons/year. See b)(2)e and c)(1)
c.	OAC rule 3745-31-05(F) December 1, 2006	The permittee will accept voluntary restrictions for PE, PM ₁₀ and PM _{2.5} to avoid modeling. PE shall not exceed 6.40 tons per year. PE from the fabric filter/baghouse shall not exceed 0.02 grain/dry standard cubic foot of exhaust. PM ₁₀ emissions shall not exceed 3.00 tons per year. PM _{2.5} emissions shall not exceed 0.46 ton per year. See b)(2)e and c)(1).
d.	OAC rule 3745-17-07(A)	Visible PE from the fabric filter/baghouse control system shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-07(B)	Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average.
f.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)a through b)(2)c.

(2) Additional Terms and Conditions

- a. This permit takes into account the use of a fabric filter/baghouse control system, whenever this air contaminant source is in operation with a minimum control efficiency for PE of 99%, by weight.
- b. The permittee shall employ reasonably available control measures for the above-referenced material handling operations for the purpose of ensuring compliance with the above referenced applicable requirements. Such reasonably available

control measures shall include, but not limited to, one or more of the following which are appropriate to minimize or eliminate visible particulate emissions of fugitive dust.

- i. In accordance with the permittee's application, the permittee has committed to containing this emissions unit
 - (a) with an enclosure for the conveyor operations;
 - (b) to provide an enclosed loading spout for the bulk loading operations to ensure compliance with the emissions limitations;
 - (c) the partial enclosure and seal at railroad car bottom; and
 - (d) the use of a 1200 acfm fabric filter/baghouse to control particulate emissions.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design, standards and practices.

- ii. The permittee shall cover, at all times, any conveyors or open bodied vehicles when transporting materials that are likely to become airborne.
- iii. The permittee shall minimize the drop heights for any related transfer points from the discharge point, conveyor, and/or loading spout.

Nothing in these paragraphs shall prohibit or limit the permittee from employing other control measures to ensure compliance.

- c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- d. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- e. 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) Operational Restrictions

- (1) The maximum annual throughput for this emissions unit is limited to 935,000 tons of frac sand per year.
- (2) 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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 6.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the fabric filter/baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the fabric filter/baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the fabric filter/baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a "minor permit modification."

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit as well as at the material transfer points located outside of the building. 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.

- (4) The permittee shall maintain the following records on a monthly basis:
- a. the type (i.e. frac sand) and amount of material processed at this emissions unit.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
 - f. an identification of when the annual throughput limitation as specified in c)(1) was exceeded; and
 - g. the actual throughput for the limitation that was exceeded.



If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

PE from the fabric filter/baghouse shall not exceed 0.02 gr/dscf of exhaust.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

- b. Emission Limitation:

PE shall not exceed 6.40 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:



E_T (ton/year) = [E_1 (pounds/year) + E_2 (pounds/year) + E_3 (pounds/year)]/ [2000 pounds/ton]

where:

E_T = total annual emissions of PE from E_1, E_2, and E_3 in tons/year;

E_1 = [(EF_1) (annual throughput (tons/year)) (1-CE_1)];

EF_1 = 0.0141 pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006;

CE_1 = control efficiency (70%), from Ohio EPA RACM, Material Handling Control Efficiencies, for partial enclosure, railcar bottom seal, and minimal material drop;

E_2 = [(EF_2) (annual throughput (tons/year))];

EF_2 = 0.00014 pound/ton, from AP-42, Section 11.19.2, Crushed Stone Processing and Pulverized Mineral Processing, August 2004;

E_3 = [(EF_3) (annual throughput (tons/year)) (1-CE_3)];

EF_3 = 0.0141 pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006; and

CE_3 = overall control efficiency (79.2%), from control efficiencies calculation, based an 80% loading spout capture efficiency and a 99% fabric filter/baghouse control efficiency.

c. Emission Limitation:

PM_10 emissions shall not exceed 3.00 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

E_T (ton/year) = = [E_1 (pounds/year) + E_2 (pounds/year) + E_3 (pounds/year)]/2000 pounds/ton

where:

E_T = total annual emissions of PM_10 from E_1, E_2, and E_3 in tons/year;

E_1 = [(EF_1) (annual throughput (tons/year)) (1-CE_1)];

EF_1 = 0.0067 pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006;

CE_1 = control efficiency (70%), from Ohio EPA RACM, Material Handling Control Efficiencies, for partial enclosure, railcar bottom seal, and minimal material drop;



$$E_2 = [(EF_2) \text{ (annual throughput (tons/year))}]$$

$EF_2 = 0.000046$ pound/ton, from AP-42, Section 11.19.2, Crushed Stone Processing and Pulverized Mineral Processing, August 2004;

$$E_3 = [(EF_3) \text{ (annual throughput (tons/year))} (1-CE_3)]$$

$EF_3 = 0.0067$ pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006; and

$CE_3 =$ overall control efficiency (79.2%), from control efficiencies calculation, based an 80% loading spout capture efficiency and a 99% fabric filter/baghouse control efficiency.

d. Emission Limitation:

$PM_{2.5}$ emissions shall not exceed 0.46 ton per year.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E_T \text{ (ton/year)} = [E_1 \text{ (pounds/year)} + E_2 \text{ (pounds/year)} + E_3 \text{ (pounds/year)}] / 2000 \text{ pounds/ton}$$

where:

$E_T =$ total annual emissions of PE from E_1 , E_2 , and E_3 in tons/year;

$$E_1 = [(EF_1) \text{ (annual throughput (tons/year))} (1-CE_1)]$$

$EF_1 = 0.0010$ pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006;

$CE_1 =$ control efficiency (70%), from Ohio EPA RACM, Material Handling Control Efficiencies, for partial enclosure, railcar bottom seal, and minimal material drop;

$$E_2 = [(EF_2) \text{ (annual throughput (tons/year))}]$$

$EF_2 = 0.000013$ pound/ton, from AP-42, Section 11.19.2, Crushed Stone Processing and Pulverized Mineral Processing, August 2004;

$$E_3 = [(EF_3) \text{ (annual throughput (tons/year))} (1-CE_3)]$$

$EF_3 = 0.0010$ pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006; and

$CE_3 =$ overall control efficiency (79.2%), from control efficiencies calculation, based an 80% loading spout capture efficiency and a 99% fabric filter/baghouse control efficiency.



e. Emission Limitation:

Visible PE from the fabric filter/baghouse control system shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

f. Emission Limitation:

Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.



17. F018, Stored Frac Sand Loadout

Operations, Property and/or Equipment Description:

Stored frac sand loadout with a 13,000 acfm fabric filter/baghouse at hopper and beltline transfer point and 1200 acfm fabric filter/baghouse at loading spout.

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. 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) November 30, 2001	<p>Particulate emissions (PE) shall not exceed 3.54 tons per year.</p> <p>PE from the fabric filter/baghouse shall not exceed 0.02 grain/dry standard cubic foot of exhaust.</p> <p>Particulate emissions equal to or less than 10 microns in diameter (PM₁₀) shall not exceed 1.67 tons per year.</p> <p>Particulate emissions equal to or less than 2.5 microns in diameter (PM_{2.5}) shall not exceed 0.25 ton per year.</p> <p>See b)(2)d, c)(1) and c)(2).</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii) December 1, 2006	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, PM ₁₀ and PM _{2.5} emissions from these air contaminant sources since the potential to emit is less than 10 tons/year. See b)(2)e, c)(1) and c)(2).
c.	OAC rule 3745-31-05(F) December 1, 2006	The permittee will accept voluntary restrictions for PE, PM ₁₀ and PM _{2.5} to avoid modeling. PE shall not exceed 3.54 tons per year. PE from the fabric filter/baghouse shall not exceed 0.02 grain/dry standard cubic foot of exhaust. PM ₁₀ emissions shall not exceed 1.67 tons per year. PM _{2.5} emissions shall not exceed 0.25 ton per year. See b)(2)e, c)(1) and c)(2).
d.	OAC rule 3745-17-07(A)	Visible PE from the fabric filter/baghouse control system shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-07(B)	Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average.
f.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See b)(2)a through b)(2)c.

(2) Additional Terms and Conditions

- a. This permit takes into account the use of a fabric filter/baghouse control system, whenever this air contaminant source is in operation, with a minimum control efficiency of 99%, by weight of PE.
- b. The permittee shall employ reasonably available control measures for the above-referenced material handling operations for the purpose of ensuring compliance with the above referenced applicable requirements. Such reasonably available

control measures shall include, but not limited to, one or more of the following which are appropriate to minimize or eliminate visible particulate emissions of fugitive dust.

- i. In accordance with the permittee's application, the permittee has committed to containing this emissions unit:
 - (a) with an enclosure for the conveyor operations;
 - (b) to provide a building enclosure for the feed hopper, vibratory feeder and conveyor beltline;
 - (c) the use of a load-out shed from conveyor belt line to pneumatic (bulk) trailer via loading spout transfer point; and
 - (d) the use of both a 1200 acfm and 13,000 acfm fabric filter/baghouses to control particulate emissions.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design, standards and practices.

- ii. The permittee shall cover, at all times, any conveyors or open bodied vehicles when transporting materials that are likely to become airborne.
- iii. The permittee shall minimize the drop heights for any related transfer points from the discharge point, conveyor, and/or loading spout.

Nothing in these paragraphs shall prohibit or limit the permittee from employing other control measures to ensure compliance.

- c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
 - d. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - e. 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) Operational Restrictions
- (1) The maximum annual throughput for this emissions unit is limited to 935,000 tons of frac sand per year.

- (2) The permittee shall only use the top and bottom static non-vibratory scalp screeners to remove foreign debris from the frac sand material and shall not use the screeners for material sizing purposes.
- (3) 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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 6.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the fabric filter/baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the fabric filter/baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;

- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the fabric filter/baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a "minor permit modification."

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit as well as at the material transfer points located outside of the building. 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.

- (4) The permittee shall maintain the following records on a monthly basis:
 - a. the type (i.e. frac sand) and amount of material processed at this emissions unit.
- e) Reporting Requirements
 - (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
 - (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;

- f. an identification of when the annual throughput limitation as specified in c)(1) was exceeded; and
- g. the actual throughput for the limitation that was exceeded.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:
PE from the fabric filter/baghouse shall not exceed 0.02 gr/dscf of exhaust.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
 - b. Emission Limitation:

PE shall not exceed 3.54 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E_T \text{ (ton/year)} = [E_1 \text{ (pounds/year)} + E_2 \text{ (pounds/year)} + E_3 \text{ (pounds/year)}] / [2000 \text{ pounds/ton}]$$

where:

E_T = total annual emissions of PE from E_1 , E_2 , and E_3 , in tons/year;

$$E_1 = 2 [(EF_1) \text{ (annual throughput (tons/year))} (1-CE_1)];$$

2- number of drop points;

EF_1 = 0.0141 pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006;

CE_1 = overall control efficiency (91.2%), from control efficiencies calculation, based on 60% building capture and a 99% fabric filter/baghouse control efficiency;

$$E_2 = [(EF_2) \text{ (annual throughput (tons/year))} (1-CE_2)];$$

EF_2 = 0.00014 pound/ton, from AP-42, Section 11.19.2, Crushed Stone Processing and Pulverized Mineral Processing, August 2004;

CE_2 = control efficiency (60%), from covered conveyor, characteristic of minimum control efficiency;

$$E_3 = [(EF_3) \text{ (annual throughput (tons/year))} (1-CE_3)];$$

EF_3 = 0.0141 pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006; and

CE_3 = overall control efficiency (89.2%), from control efficiencies calculation, based on 50% load out shed capture and a 99% fabric filter/baghouse control efficiency.

c. Emission Limitation:

PM₁₀ emissions shall not exceed 1.67 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E_T \text{ (ton/year)} = [E_1 \text{ (pounds/year)} + E_2 \text{ (pounds/year)} + E_3 \text{ (pounds/year)}] / [2000 \text{ pounds/ton}]$$

where:



E_T = total annual emissions of PE from E_1 , E_2 , and E_3 , in tons/year;

$E_1 = 2 [(EF_1) (\text{annual throughput (tons/year)}) (1-CE_1)]$;

2- number of drop points;

$EF_1 = 0.0067$ pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006;

$CE_1 =$ overall control efficiency (91.2%), from control efficiencies calculation, based on 60% building capture and a 99% fabric filter/baghouse control efficiency;

$E_2 = [(EF_2) (\text{annual throughput (tons/year)}) (1-CE_2)]$;

$EF_2 = 0.000046$ pound/ton, from AP-42, Section 11.19.2, Crushed Stone Processing and Pulverized Mineral Processing, August 2004;

$CE_2 =$ control efficiency (60%), from covered conveyor, characteristic of minimum control efficiency;

$E_3 = [(EF_3) (\text{annual throughput (tons/year)}) (1-CE_3)]$;

$EF_3 = 0.0067$ pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006; and

$CE_3 =$ overall control efficiency (89.2%), from control efficiencies calculation, based on 50% load out shed capture and a 99% fabric filter/baghouse control efficiency.

d. Emission Limitation:

PM_{2.5} emissions shall not exceed 0.25 ton per year.

Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E_T (\text{ton/year}) = [E_1 (\text{pounds/year}) + E_2 (\text{pounds/year}) + E_3 (\text{pounds/year})] / [2000 \text{ pounds/ton}]$$

where:

E_T = total annual emissions of PE from E_1 , E_2 , and E_3 , in tons/year;

$E_1 = 2 [(EF_1) (\text{annual throughput (tons/year)}) (1-CE_1)]$;

2- number of drop points;

$EF_1 = 0.0010$ pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006;



CE_1 = overall control efficiency (91.2%), from control efficiencies calculation, based on 60% building capture and a 99% fabric filter/baghouse control efficiency;

$E_2 = [(EF_2) \text{ (annual throughput (tons/year)) (1-CE}_2)];$

$EF_2 = 0.000013$ pound/ton, from AP-42, Section 11.19.2, Crushed Stone Processing and Pulverized Mineral Processing, August 2004;

CE_2 = control efficiency (60%), from covered conveyor, characteristic of minimum control efficiency;

$E_3 = [(EF_3) \text{ (annual throughput (tons/year)) (1-CE}_3)];$

$EF_3 = 0.0010$ pound/ton, from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles, November 2006; and

CE_3 = overall control efficiency (89.2%), from control efficiencies calculation, based on 50% load out shed capture and a 99% fabric filter/baghouse control efficiency.

e. Emission Limitation:

Visible PE from the fabric filter/baghouse control system shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

f. Emission Limitation:

Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.



18. P901, Rotary Dryer

Operations, Property and/or Equipment Description:

Rotary Dryer

- 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. 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.	Director's Final Findings and Orders, issued on February 8, 2010.	The permittee has ceased processing affected materials in this emissions unit. Therefore, the Director's Final Findings and Orders, issued on February 8, 2010 for this emissions unit do not apply. See c)(1).
b.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.23 lb/hr and 1.01 tpy. Visible fugitive PE shall not exceed 5% opacity as a 3-minute average from the dryer building. PE from the fabric filter/baghouse shall not exceed 0.02 grain/dry standard cubic foot of exhaust. No visible PE from the exhaust



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>stackserving this emissions unit.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 and OAC rule 3745-17-08.</p>
c.	<p>OAC rule 3745-17-07(A) OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)</p>	<p>The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall not process materials that contain ferromanganese and other materials with a manganese content (raw material, intermediate, or finished product) that are processed or otherwise handled on site in such a manner that could cause the generation of stack or fugitive emissions containing ferromanganese or manganese compounds in this emissions unit.

(2) 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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2.0 to 6.0 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit as well as at the material transfer points located outside of the building. 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.

- (4) The permittee shall maintain the following records on a monthly basis:
 - a. the type (i.e. ferromanganese/affected materials) and amount of material processed at this emissions unit.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;
- c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
- e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- f. an identification of any month when any affected materials were processed in this emissions unit as specified in c)(1); and
- g. the actual throughput of affected materials processed.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the “Additional Information and Corrections” section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

PE shall not exceed 0.23 lb/hr and 1.01 tpy.

Applicable Compliance Method:

Compliance with the allowable hourly/annual particulate emissions rate shall be demonstrated using emission factors outlined in AP-42 (Fifth Edition, 1995), Section 13.2.4 (Aggregate Handling and Storage Piles) and Section 1.4 (Natural Gas Combustion) using the following equations:

$$E^a \text{ (tpy)} = (EF * AP * (1 - CE/100) / 2000 \text{ lbs/ton}) + \text{natural gas combustion}$$

where:

E^a = this equation should be used for the rotary dryer, screener and TP#1-10, thus "E" equals the sum of each emission points mentioned above;

EF = emission factors (0.0125 (rotary dryer), 0.025 (screener), 0.0003 (TP#1), 0.0030 (TP#2-#7 and #9) and 0.0053 (TP#8 & #10) lb PM / ton of material processed);

AP = maximum annual production rate (per application 0.219 (dryer, screener and TP#1-#10) million tons);

CE = control efficiency of the baghouse/building (per application 99.9% (only for the rotary dryer) and 90% (TP#2-#10));

2000 = conversion factor, pounds per ton; and

$$\text{Natural gas combustion} = (17.52 \text{ mmcf/yr} * 7.6 \text{ lbs/mmcf}) / 2000.$$

$$E \text{ (lb/hr)} = (E(\text{tpy}) / 8760 \text{ hrs/yr}) * 2000 \text{ lbs/ton}$$

b. Emission Limitation:

Visible fugitive PE shall not exceed 5% opacity as a 3-minute average from the dryer building.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.



c. Emission Limitation:

PE from the fabric filter/baghouse shall not exceed 0.02 grain/dry standard cubic foot of exhaust.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emission Limitation:

No visible PE from the exhaust stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

- (1) None.



19. P902, OH Side Truck Loadout Shed

Operations, Property and/or Equipment Description:

Ohio Side Product Truck Loadout Shed, equipped with a 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. d)(7)

(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)a, b)(2)a, b)(2)b and c)(1)

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(D)(1)(b) OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from the stack shall not exceed 0.16 ton per rolling, 12-month period.</p> <p>Particulate emissions less than 10 microns in diameter (PM₁₀) from the stack shall not exceed 0.08 ton per rolling, 12-month period.</p> <p>Chromium (Cr) emissions from the stack shall not exceed 0.03 ton per rolling, 12-month period (see c)(1) and c)(2)).</p> <p>Manganese (Mn) emissions from the stack shall not exceed 0.03 ton per rolling, 12-month period.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible PE from the stack shall not exceed 5% opacity, as a 3-minute average.</p> <p>Visible fugitive PE shall not exceed 5% opacity, as a 3-minute average.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 and OAC rule 3745-17-08.</p> <p>See b)(2)a and b)(2)b.</p>
b.	ORC 3704.03(F)(4)(b)	See d)(7).
c.	<p>OAC rule 3745-17-07(A)</p> <p>OAC rule 3745-17-07(B)</p> <p>OAC rule 3745-17-08(B)</p>	<p>The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D)(1)(b) and OAC rule 3745-31-05(A)(3).</p>

(2) Additional Terms and Conditions

- a. This permit for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee:
 - i. The baghouse shall be in operation whenever this emissions unit is in operation.
 - ii. The maximum material throughput shall be 889,500 tons per rolling, 12-month period.
- b. Reasonably available control measures for this air contaminant source shall include, but not be limited to, the following:
 - i. The baghouse system shall be designed and operated to create a negative pressure at building openings so that there is an inward flow during operation of this emissions unit. The design shall be based on a nominal air velocity rate of 200 feet per minute at building openings. The amperage of the fan at the inlet of the baghouse shall be maintained at or above the minimum value that provides an inward flow of air at the nominal air velocity specified above. The minimum fan amperage shall be 107 amps as demonstrated during a stack test performed on May 12 and 13, 2009.
 - ii. The overhead doors for truck entrance and exit shall be in the closed position while this air contaminant source is in operation.

- iii. The vinyl strips over the door used for the front-end loader, or similar vehicle, shall be kept in good condition.
- iv. A tunnel-like structure shall be maintained over the opening where the front-end loader, or similar vehicle, enters the enclosure. This structure shall serve to reduce the effects of cross draft winds on the face of the enclosure and channel the in-draft air around the loader as it breaks the plane of the enclosure opening.

c) Operational Restrictions

- (1) The permittee shall not employ any hexavalent chromium in this emissions unit. Only ferchromium shall be employed in this emissions unit.
- (2) 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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 6.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that

determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit as well as at the material transfer points located outside of the building. 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.

- (4) The permittee shall record the following information for each month of operation for this emissions unit:
- a. the total amount, in tons, of material handled (i.e. ferrochromium and ferromanganese); and
 - b. the cumulative total amount, in tons, of material handled over the past rolling, 12-month period.
- (5) The permittee shall record the amperage of the fan at the inlet of the baghouse daily for this emissions unit.
- (6) The permittee shall calculate and record the following emission rates each month by using the following equations:

a. PE from the stack:

$$PE = M \times EF \times \text{ton}/2,000 \text{ lbs} \times C$$

where:

$$PE = \text{tons particulate per rolling, 12-months.}$$

M = amount of material handled, in tons, as recorded in section d)(4)b.

EF = 0.0141, emission factor, in lb PE /ton, as calculated by Equation (1) in AP-42, 13.2.4 (1/95) or most recent version. The selected "k" value for PE in equation (1) shall represent a particle size less than 30 micrometers.

C = weight fraction emitted from the stack, which is [(1-0.01)(1-0.99)], or 0.01. Not less than 99% of the generated emissions are estimated to be captured. The captured emissions are controlled by a baghouse with a control efficiency of not less than 99%.

b. PM₁₀ emissions from the stack:

$$PM_{10} = M \times EF \times \text{ton}/2,000 \text{ lbs} \times C$$

where:

$$PM_{10} = \text{tons PM}_{10} \text{ per rolling, 12-months.}$$

M = amount of material handled, in tons, as recorded in section d)(4)b.

EF = 0.0067, emission factor, in lb PE or PM₁₀/ton, as calculated by Equation (1) in AP-42, 13.2.4 (1/95) or most recent version. The selected "k" value for PM₁₀ in equation (1) shall represent a particle size less than 10 micrometers.

C = weight fraction emitted from the stack, which is [(1-0.01)(1-0.99)], or 0.01. Not less than 99% of the generated emissions are estimated to be captured. The captured emissions are controlled by a baghouse with a control efficiency of not less than 99%.

c. Cr emissions from the stack:

$$Cr = PE \times (\%Cr / 100)$$

where:

Cr = tons chromium per rolling, 12-months.

PE = tons particulate from stack per rolling, 12-months, as calculated in section d)(6)a.

%Cr = 18.9 (The PTI application reports the maximum elemental chromium content of the materials is 18.9%. If the actual elemental chromium content of the handled materials becomes higher, the higher decimal value shall be used.)

d. Mn emissions from the stack:

$$Mn = PE \times (\%Mn / 100)$$

where:

Mn = tons manganese per rolling, 12-months.

PE = tons particulate from stack per rolling, 12-months, as calculated in section d)(6)a.

%Mn = 20 (The PTI application reports the maximum elemental manganese content of the materials is 20%. If the actual elemental manganese content of the handled materials becomes higher, the higher decimal value shall be used.)

- (7) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's 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 permit to install prior to making a "modification" as defined by OAC rule 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 permit to install.

e) Reporting Requirements

- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
- (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
 - f. an identification of any month when the rolling, 12-month throughput limitation as specified in b)(2)a.ii. and emissions specified in f)(1) were exceeded;



- g. the actual throughput and/or emissions level for the limitations that was exceeded;
- h. any time hexavalent chromium was processed in this emissions unit; and
- i. any time the amperage of the fan at the inlet of the baghouse dropped below 107 amps.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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:

PE from the stack shall not exceed 0.16 ton per rolling, 12-month period.

- a. Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements specified in d)(6)a.



b. Emission Limitation:

PM₁₀ emissions from the stack shall not exceed 0.08 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements specified in d)(6)b.

c. Emission Limitation:

Cr emissions from the stack shall not exceed 0.03 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements specified in d)(6)c.

d. Emission Limitation:

Mn emissions from the stack shall not exceed 0.03 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements specified in d)(6)d.

e. Emission Limitation:

Visible PE from the stack shall not exceed 5% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

f. Emission Limitation:

Visible fugitive PE shall not exceed 5% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).



Draft Permit-to-Install and Operate

S H Bell - Stateline Terminal

Permit Number: P0119200

Facility ID: 0215020225

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.

20. P903, Hammermill Crushing System

Operations, Property and/or Equipment Description:

Feed hopper, conveyor belts, single deck screen, hammermill, and recycle wheel, located within a roofed building enclosure.

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)a and c)(3)

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(D)(1)(b)	See B.2 through B.6 and c)(3).
b.	OAC rule 3745-31-05(A)(3) November 30, 2001	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.02 grain/dscf, 2.57 pounds per hour and 9.90 tons per year. See b)(2)b and c)(1).
c.	OAC rule 3745-31-05(A)(3)(a)(ii) December 1, 2006	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from these air contaminant sources since the potential to emit is less than 10 tons/year. See b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(F) December 1, 2006	The permittee will accept voluntary restrictions for PE to avoid modeling. PE from the stack serving this emissions unit shall not exceed 0.02 grain/dscf, 2.57 pounds per hour and 9.90 tons per year. See c)(1).
e.	OAC rule 3745-17-07(A)	Visible PE from the fabric filter/baghouse control system shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
f.	OAC rule 3745-17-07(B)	Visible fugitive PE from the building enclosure shall not exceed 20% opacity as a 3-minute average.
g.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. See c)(2).

(2) Additional Terms and Conditions

- a. This permit takes into account the use of a baghouse system, whenever this air contaminant source is in operation, with a minimum control efficiency for PE of 99%, by weight.
- b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. 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) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 7,700 hours per year.
- (2) The permittee shall employ and maintain the baghouse and equipment associated with this emissions unit in accordance with manufacturer's recommendations. Maintenance shall include but not be limited to regular repair so as to maximize particulate collection efficiency for the system.

- (3) The maximum chromium-containing materials processed through this emissions unit shall not exceed 1,500 tons per rolling, 12-month period.
- (4) 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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 6.0 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;

- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack and of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit as well as at the material transfer points located outside of the building. 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.

- (4) The permittee shall maintain the following records on a monthly basis:

- a. the type (i.e. ferromanganese and ferrochromium) and amount of material processed at this emissions unit; and
 - b. the total hours of operation of this emissions unit.
- (5) The permittee shall inspect the baghouse monthly and record the following information:
- a. the date and time of the inspection;
 - b. any portion of the cleaning system, conveying system or hoppers that was not operating properly; and
 - c. any corrective action(s) taken.
- e) Reporting Requirements
- (1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.
 - (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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter/baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the fabric filter/baghouse;

- c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
- e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- f. all months during which a baghouse inspection was not performed;
- g. each incident of deviation described above where a prompt investigation was not conducted;
- h. each incident of deviation described where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- i. an identification of any time when the maximum annual operating hours limitation as specified in c)(1) was exceeded;
- j. an identification of any month when any of the rolling, 12-month throughput limitation as specified in c)(3) was exceeded; and
- k. the actual throughput for the limitation that was exceeded.

If there are no deviations or exceedances, the permittee shall report that no exceedances occurred during the calendar quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 Ohio EPA Northeast District Office).

- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

The above information shall be provided as an attachment to the PER. If there are no day(s) and/or corrective action(s) to identify as required above, the permittee shall

indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

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 from the stack serving this emissions unit shall not exceed 0.02 grain/dscf and 2.57 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitation:

PE from the stack serving this emissions unit shall not exceed 9.90 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the observed PE emission rate from the most recent emissions testing, by the annual hours of operation, and then dividing by 2000 lbs/ton.

c. Emission Limitation:

Visible PE from the fabric filter/baghouse control system shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

d. Emission Limitation:

Visible fugitive PE from the building enclosure shall not exceed 20% opacity as a 3-minute average.



Draft Permit-to-Install and Operate

S H Bell - Stateline Terminal

Permit Number: P0119200

Facility ID: 0215020225

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.