



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

1/20/2016

Justin Apgar
Superior Marine Ways - South Point
P.O. Box 519
South Point, OH 45680

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0744000187
Permit Number: P0120036
Permit Type: Administrative Modification
County: Lawrence

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

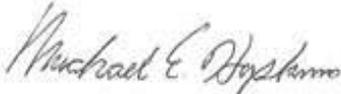
Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

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

If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: U.S. EPA
Portsmouth; Kentucky; West Virginia



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Superior Marine Ways - South Point**

Facility ID:	0744000187
Permit Number:	P0120036
Permit Type:	Administrative Modification
Issued:	1/20/2016
Effective:	1/20/2016



Division of Air Pollution Control
Permit-to-Install
for
Superior Marine Ways - South Point

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Final Permit-to-Install
Superior Marine Ways - South Point
Permit Number: P0120036
Facility ID: 0744000187
Effective Date: 1/20/2016

Authorization

Facility ID: 0744000187
Facility Description: Boat and barge repair facility
Application Number(s): M0003742
Permit Number: P0120036
Permit Description: This is an Agency initiated administrative modification to process this permit as a Title V permit-to-install.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 1/20/2016
Effective Date: 1/20/2016

This document constitutes issuance to:

Superior Marine Ways - South Point
5852 Co Rd 1
South Point, OH 45680

of a Permit-to-Install 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:

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662
(740)353-5156

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120036

Permit Description: This is an Agency initiated administrative modification to process this permit as a Title V permit-to-install.

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

Emissions Unit ID:	K001
Company Equipment ID:	Outdoor Marine Vessel Coating
Superseded Permit Number:	P0119493
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Building 1 Paint Operations
Superseded Permit Number:	P0119493
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Building 2 Painting Operations
Superseded Permit Number:	P0119493
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	Indoor Abrasive Blasting
Superseded Permit Number:	P0119493
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Superior Marine Ways - South Point
Permit Number: P0120036
Facility ID: 0744000187
Effective Date: 1/20/2016

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Portsmouth City Health Dept., Air Pollution Unit. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Portsmouth City Health Dept., Air Pollution Unit in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance 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 appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Portsmouth City Health Dept., Air Pollution Unit concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

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



Final Permit-to-Install
Superior Marine Ways - South Point
Permit Number: P0120036
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B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart II, National Emissions Standards for Hazardous Air Pollutant Emissions from Shipbuilding and Ship Repair (Surface Coating): K001, K002 and K003

The complete MACT requirements including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



Final Permit-to-Install
Superior Marine Ways - South Point
Permit Number: P0120036
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C. Emissions Unit Terms and Conditions

1. K001, Outdoor Marine Vessel Coating

Operations, Property and/or Equipment Description:

Outdoor Marine Vessel Coating of barge decks, barge interiors and barge repair.

Administrative modification to add applicability of the 40 CFR Part 63, Subpart II (Shipbuilding and Repair) MACT due to USEPA Administrative Consent Order.

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)	<p>Volatile organic compound (VOC) emissions from all coating and cleanup materials employed shall not exceed 161.75 pounds per day and 10.21 tons per year.</p> <p>The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-21-09(U)(1)(d)	The VOC content of the coating employed on the barge interiors shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(U)	The barge deck and barge repair are exempt from this rule based on OAC rule 3734-21-09(U)(2)(a) since these are exterior marine vessels.
d.	40 CFR Part 63, Subpart II (40 CFR 63.780 – 63.789)	See b)(2)b and b)(2)c.
e.	40 CFR Part 63.1 – 63.15	Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II lists which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

- a. The daily VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- b. No owner or operator shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of 40 CFR Part 63, Subpart II, as determined by the procedures described in 40 CFR 63.785(c)(1) through (c)(3).
- c. Each owner or operator shall ensure that:
 - i. all handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills; and
 - ii. all containers, tanks, vats, drums, and piping systems are free of cracks, holes and other defects and remain closed unless materials are being added to or removed from them.

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup materials employed;

- c. the VOC content of each coating and cleanup material employed, in pounds per gallon; and
 - d. the total VOC emissions from all the coating and cleanup materials employed, in pounds [i.e., the sum of d)(1)b times d)(1)c for each coating and cleanup material employed].
- (2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).
- e) Reporting Requirements
- (1) The permittee shall notify the Director (Portsmouth Local Air Agency) in writing of each record showing a coating, used for barge interiors, greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Portsmouth Local Air Agency) within 30 days after the exceedance occurs.
 - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).
- 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:

VOC emissions from all coating and cleanup materials employed shall not exceed 161.75 pounds per day.

Applicable Compliance Method:

The daily VOC emission limitation was determined based on the sum of the following:

Determine the daily emissions from the barge decks, barge interiors and barge repair parts by multiplying the maximum amount of coating and cleanup material used (gal/day) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each.
 - b. Emission Limitation:

VOC emissions from all coating and cleanup materials employed shall not exceed 10.21 tons per year.



Applicable Compliance Method:

The annual VOC emission limitation was determined based on the sum of the following:

Determine the annual emissions from the barge decks, barge interiors and barge repair parts by multiplying the maximum amount of coating and cleanup material used (gal/year) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each, and then dividing by 2000 lbs/ton.

Compliance with this emission limitation shall be based on the record keeping requirements specified in d)(1).

- g) Miscellaneous Requirements
 - (1) None.

2. K002, Building 1 Coating Operations

Operations, Property and/or Equipment Description:

Building 1 Coating Operation - coating of new/refurbished boats and miscellaneous metal parts.

Administrative modification to add applicability of the 40 CFR Part 63, Subpart II (Shipbuilding and Repair) MACT due to USEPA Administrative Consent Order.

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)	<p>Volatile organic compound (VOC) emissions from all coating and cleanup materials employed shall not exceed 123.14 pounds per day and 0.52 ton per year.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-21-09(U)	<p>The new/refurbished boats are exempt from this rule based on OAC rule 3734-21-09(U)(2)(a) since these are exterior marine vessels.</p> <p>The miscellaneous metal parts are exempt from this rule based on OAC rule 3745-21-09(U)(2)(e)(iii) since they do not use more than 10 gallons per day.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63, Subpart II (40 CFR 63.780 – 63.789)	See b)(2)b and b)(2)c.
d.	40 CFR Part 63.1 – 63.15	Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II lists which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

- a. The daily VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- b. No owner or operator shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of 40 CFR Part 63, Subpart II, as determined by the procedures described in 40 CFR 63.785(c)(1) through (c)(3).
- c. Each owner or operator shall ensure that:
 - i. all handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills; and
 - ii. all containers, tanks, vats, drums, and piping systems are free of cracks, holes and other defects and remain closed unless materials are being added to or removed from them.

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup materials employed;
 - c. the VOC content of each coating and cleanup material employed, in pounds per gallon; and

- d. the total VOC emissions from all the coating and cleanup materials employed, in pounds [i.e., the sum of d)(1)b times d)(1)c for each coating and cleanup material employed].
 - (2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).
- e) Reporting Requirements
 - (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.
 - (2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).
- 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:

VOC emissions from all coating and cleanup materials employed shall not exceed 123.14 pounds per day.

Applicable Emission Limitation:

The daily VOC emission limitation was determined based on the sum of the following:

Determine the daily emissions for the new/refurbished boats and miscellaneous metal parts by multiplying the maximum amount of coating and cleanup material used (gal/day) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each.
 - b. Emission Limitation:

VOC emissions from all coating and cleanup materials employed shall not exceed 0.52 ton per year.

Applicable Emission Limitation:

The annual VOC emission limitation was determined based on the sum of the following:

Determine the annual emissions for the new/refurbished boats and miscellaneous metal parts by multiplying the maximum amount of coating and



cleanup material used (gal/year) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each, and then dividing by 2000 lbs/ton.

Compliance with this emission limitation shall be based on the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.

3. K003, Building 2 Coating Operations

Operations, Property and/or Equipment Description:

Building 2 Painting Operation - indoor painting of barges equipped with dry filtration system.

Administrative modification to add applicability of the 40 CFR Part 63, Subpart II (Shipbuilding and Repair) MACT due to USEPA Administrative Consent Order.

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.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions from all coating and cleanup materials employed shall not exceed 1.68 tons per month average over a 12-month, rolling period.
b.	OAC rule 3745-21-09(U)	This emissions unit is exempt from this rule based on OAC rule 3734-21-09(U)(2)(a) since these are exterior marine vessels.
c.	OAC rule 3745-17-11(C)	See c)(1), c)(2) and d)(2) through d)(6)
d.	40 CFR Part 63, Subpart II (40 CFR 63.780 – 63.789)	See b)(2)a and b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63.1 – 63.15	Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II lists which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.

(2) Additional Terms and Conditions

- a. No owner or operator shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of 40 CFR Part 63, Subpart II, as determined by the procedures described in 40 CFR 63.785(c)(1) through (c)(3).
- b. Each owner or operator shall ensure that:
 - i. all handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills; and
 - ii. all containers, tanks, vats, drums, and piping systems are free of cracks, holes and other defects and remain closed unless materials are being added to or removed from them.

c) Operational Restrictions

- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup materials employed;
 - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;

- d. the total VOC emissions from all the coating and cleanup materials employed, in pounds [i.e., the sum of d)(1)b times d)(1)c for each coating and cleanup material employed]; and
 - e. the total VOC emissions from all the coating and cleanup materials employed, in tons, averaged over a 12 month, rolling period.
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Portsmouth Local Air Agency upon request.
 - (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Portsmouth Local Air Agency upon request.
 - (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
 - (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.
- These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Portsmouth Local Air Agency upon request.
- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Portsmouth Local Air Agency upon request.
 - (7) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.
- (2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

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:

VOC emissions from all coating and cleanup materials employed shall not exceed 1.68 tons per month averaged over a 12-month, rolling period.

Applicable Compliance Method:

Compliance shall be determined based on the sum of the coating and cleanup material by multiplying the maximum amount of coating and cleanup material used (gal/year) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each, and then dividing by 2000 lbs/ton and dividing by 12 months/year.

Compliance with this emission limitation shall be based on the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) None.

4. P001, Building 2 Indoor Abrasive Blasting

Operations, Property and/or Equipment Description:

Building 2 indoor abrasive blasting with dust collection system.

Administrative modification to add dust collection system as a Supplemental Environmental Project (SEP) in accordance with USEPA Consent Agreement and Final Order (CAFO).

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) June 30, 2008	Install a dust collection system with a design control efficiency of at least 99% control of particulate matter (PM) See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PM from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E). See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(E) June 30, 2008	PM emissions shall not exceed 0.13 ton per year. Install a dust collection system with a design control efficiency of at least 99% control of PM.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)	PE shall not exceed 4.17 pounds per hour.

(2) Additional Terms and Conditions

- a. The 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).
- b. These requirements apply once U.S.EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The dust collection system shall be installed in accordance with the Supplemental Environmental Project (SEP) as required in the US EPA Consent Agreement and Final Order (CAFO) issued August 18, 2015.

c) Operational Restrictions

- (1) The permittee shall not use Black Beauty as a blasting media in this emissions unit or any alternative media that is more toxic than steel shot.
- (2) The permittee shall employ the dust collection system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time periods when the dust collection system was not in service when the emissions unit was in operation.
- (2) For each day during which the permittee uses an alternative blasting media that is more toxic than steel shot, the permittee shall maintain a record of the type and quantity of blasting media used in this emissions unit.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in

an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when an alternative blasting media is used and/or when the dust collection was not in service when the emissions unit was in operation. Each report shall be submitted within 30 days after the deviation occurs.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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 permit evaluation report in accordance with the monitoring requirements for visible emissions in term d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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:

Install a dust collection system with a design control efficiency of at least 99% control of PM.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with 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:

PM emissions shall not exceed 0.13 ton per year.

Applicable Compliance Method:

This emission limitation was derived by multiplying the emission factor from STAPPA/ALAPCO "Air Quality Permits", Vol. 1, Section 3 "Abrasive Blasting" (1991 ed) (PM 0.01 lb/lb abrasive) by the maximum annual abrasive used (2,600,000 lbs/year) and by 99% control efficiency for the use of the dust collection system, and dividing by 2000 lbs/ton.

c. Emission Limitation:

Visible PE from the 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 with the stack visible particulate emission limitation 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 4.17 pounds per hour.

Applicable Compliance Method:

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



Final Permit-to-Install
Superior Marine Ways - South Point
Permit Number: P0120036
Facility ID: 0744000187
Effective Date: 1/20/2016

- g) Miscellaneous Requirements
 - (1) None.