

Facility ID: 1318452766 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1318452766 Emissions Unit ID: P010 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P010 - Lawn mower blades hardening line #1 with the following activities and equipment: Natural gas burning activity to provide heat to cleaning and rinsing tanks, hot air dryer, 3-compartment rinse tank, and outlet hot dryer, with a total rating of 4.3 MM BTU/hr.	OAC rule 3745-31-05(A)(3) (PTI No. 13-03846)	PE: 0.10 lb/hr, 0.44 tpy SO2: 0.0026 lb/hr, 0.011 tpy NOx: 0.43 lb/hr, 1.88 tpy CO: 0.09 lb/hr, 0.39 tpy VOC: 0.03 lb/hr, 0.13 tpy
	OAC rule 3745-17-10(B)(1)	Visible emissions from any stack servicing this emissions unit shall not exceed 5% percent opacity, as a six minute average.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
High heat tank for the metal blades quenching activity	OAC rule 3745-31-05(A)(3)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). PE: 0.725 lb/hr, 3.175 tpy
		best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.a, and A.2.b)
	OAC rule 3745-17-11(A)(2)	visible fugitive particulate emissions from the tanks servicing this emission unit shall not exceed 5% opacity, as a 3-minute average.
	OAC rule 3745-17-07(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
Tank for rust inhibitor application activity into the metal blades	OAC rule 3745-31-05(A)(3)	The control measures specified by this rule are less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3). VOC: 0.06 lb/hr, 0.265 tpy
	OAC rule 3745-21-09(U)(1)(i)	The control measures specified by this rule are less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The permittee shall employ best available control measures to prevent fugitive dust emissions, and to assure compliance with the above-mentioned applicable requirements. If required, best control measures may include the installation of hoods, fans, or other type of equipment to adequately enclose,

contain, capture, vent and control fugitive dust generated by the process.
Implementation of the above-mentioned control measure(s) 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. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month pertaining the high heat tank for quenching activity at this emissions unit:
 - a. The name and identification number of the salt material used in this quenching tank.
 - b. The following information must be recorded for the salt material used in this quenching tank:
 - i. the total amount of salt purchased for the quenching tank, in pounds per month;
 - ii. the total salt moisture content, (% per supplier);
 - iii. the total amount of high heat tank salt used to fill the tank upon cleaning, in pounds per month;
 - iv. the total amount of quench salt used to fill tank upon cleaning, in pounds per month;
 - v. the total amount of salt sludge removed for disposal, in pounds per month;
 - vi. the total amount of salt carried over to rinse tank & discharged to sewer, in pounds per month; and
 - vii. the amount of salt solids collected from equipment deposition/spills, in pounds per month.
 - c. The total monthly operating hours for the high heat tank used for quenching, hours per month.
 - d. The particulate emissions from the high heat tank used for quenching, in pounds per month.
2. The permittee shall collect and record the following information each month pertaining the rust inhibitor application activity for this emissions unit:
 - a. The name and identification number of each rust inhibitor material applied unto the lawn mower blades, as applied.
 - b. The following information must be recorded for each rust inhibitor material applied unto the lawn mower blades:
 - i. the total volume of each rust inhibitor used, in gallons per month;
 - ii. the total volume of each rust inhibitor used, in gallons per year; and
 - iii. the VOC content of each rust inhibitor used, in pounds per gallon.
 - c. The total monthly operating hours for the rust inhibitor application tank.
 - d. The VOC emissions from all the rust inhibitor material used in the rust inhibitor application tank.

D. Reporting Requirements

1. For the high heat tank for the metal blades quenching activity associated with this emission unit, the permittee shall submit semiannual deviation (excursion) reports to the CBAPC which identify each day during which the average hourly total particulate mist emissions exceeded 0.725 pounds per hour.
2. For the rust inhibitor application activity associated with this emissions unit, the permittee shall submit semiannual deviation (excursion) reports to the Cleveland Bureau of Air Pollution Control (CBAPC) which identify each day during which the average hourly total emissions exceeded the following limitations: 0.06 lbs/hr.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:
Natural gas burning activity

0.44 tpy PE
0.10 lb/hr PE

Compliance with the particulate emission limits shall be based on calculations using the appropriate emission factor (4.5 lb/ MMcf) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft³, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 201, if required. Annual emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

Emission Limitation:
Natural gas burning activity

0.011 tpy SO₂
0.0026 lb/hr SO₂

Applicable Compliance Method:

Compliance with the SO₂ emission limits shall be based on calculations using the appropriate emission factor (0.60 lb/ MMcf) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft³, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 6, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

Emission Limitation:

Natural gas burning activity

1.88 tpy NO_x

0.43 lb/hr NO_x

Applicable Compliance Method:

Compliance with the NO_x emission limits shall be based on calculations using the appropriate emission factor (100 lb/ MMcf) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft³, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 7, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

Emission Limitation:

Natural gas burning activity

0.39 tpy CO emissions

0.09 lbs/hr CO

Applicable Compliance Method:

Compliance with the CO emission limits shall be based on calculations using the appropriate emission factor (21 lb/ MMcf) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft³, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 10, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

Emission Limitation:

Natural gas burning activity

0.13 tpy VOC

0.03 lb/hr VOC

Applicable Compliance Method:

Compliance with the VOC emission limits shall be based on calculations using the appropriate emission factor (8.0 lb/ MMcf) multiplied by total heat input (BTU/hr) used by the emissions unit and dividing by a factor of 1,000 Btu/ft³, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 25, if required. Yearly emission limitations shall be based on the calculated hourly emission rate multiplied by the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

Emission Limitation:

visible emissions from any stack

5% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined in accordance with USEPA Method 9, 40 CFR part 60.

Emission Limitation:

High heat tank for quenching activity

3.175 tpy PE

0.73 lb/hr PE

Compliance with the PE emission limits shall be based on record keeping specified in Section C.1., and through the use of the following expression:

$$E = [(P) - (M) - (H) - (Q) - (S) - (C) - (D)] / [T]$$

where,

E = the particulate emissions from the high heat tank used for quenching, pounds per month

P = the total salt purchased for the quenching tank, pounds per month

M = the total salt moisture content, (% per supplier)

H = the total high heat tank salt used to fill the tank upon cleaning, pounds per month

Q = the total quench salt used to fill tank upon cleaning

S = the total salt sludge removed for disposal, pounds per month

C = the total salt carried over to rinse tank & discharged to sewer, pounds per month

D = the salt solids collected from equipment deposition/spills, pounds per month

T = the total monthly operating hours for the high heat tank used for quenching, hours per month.

Annual emission limitations shall be based on the calculated hourly emission rate multiplied by the summation of the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

Emission Limitation:

Fugitive emissions from the metal blades quenching tank

5% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined in accordance with USEPA Method 9, 40 CFR part 60. For purposes of verifying compliance with this limitation, visible particulate emissions observations shall be performed at any non-stack egress point (e.g., windows, doors, roof monitors) serving this emissions unit.

Emission Limitation:

Rust inhibitor application activity

0.265 tpy VOC

0.06 lb/hr VOC

Applicable Compliance Method:

Compliance shall be based upon record keeping specified in Section C.2, and using the following expression:

$$E = [(D) \times (Q)] / (T)$$

where:

E = total VOC emissions, lb/hr

D = VOC content of the rust inhibitor as applied, lb/gallon

Q = total rust inhibitor usage, gallon/month

T = total operating schedule, hour/month

U.S. EPA Method 24 and 24 A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings as received from the manufacturer and supplier.

Annual emission limitations shall be based on the calculated hourly emission rate multiplied by the summation of the total yearly operating hours, and dividing by a factor of 2,000 lb/ton.

F. **Miscellaneous Requirements**

1. None