OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
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Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
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P.O. Box 1049
Columbus, OH 43216-1049

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S.E.D.O.
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07/07/05

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P005 (Dryer #1) McDermott Dryer #1**

Cedar Heights Clay (06-40-01-0010)
Linda S. Simpson
PO Box 295
Oak Hill, OH 45656

Dear Linda S. Simpson:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact Southeast District Office.

Sincerely,

Michael W. Ahern

Michael W. Ahern
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Southeast District Office

State of Ohio Environmental Protection Agency

# Final Permit To Operate An Emissions Unit

Effective Date: 07/07/05

Expiration Date: 07/07/10

This document constitutes issuance to:

Facility ID: 06-40-01-0010
Cedar Heights Clay
3542 SR 93
Oak Hill, OH 45656

of a permit to operate for:

P005 (Dryer #1)
McDermott Dryer #1

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Joseph P. Koncelik
Director

## Part I: General Terms and Conditions

### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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 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 appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

### 4. Records Retention Requirements

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 the permit. Such records may be maintained in computerized form.

### 5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the

Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. 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 of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**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. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

# Part II: Special Terms and Conditions

## 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| McDermott Dryer #1 (30.0 TPH), 4.0 mmBtu/hr natural gas fired dryer with a baghouse and an enclosure | OAC rule 3745-35-07(B) | 15.4 lbs/hr of particulate emissions |
| | | 18.0 tons of particulate emissions per rolling, 12-month period |
| | | 1.0 lb/hr of sulfur dioxide emissions |
| | | See section A.2.a. |
| | OAC rule 3745-17-11 | See section A.2.b. |
| | OAC rule 3745-17-07(A) | See section A.2.b. |
| | OAC rule 3745-17-07(B) | See section A.2.c. |
| | OAC rule 3745-17-08(B) | See section A.2.c. |
| | OAC rule 3745-18-06 | See section A.2.b. |

2. **Additional Terms and Conditions**

**2.a** There shall be no visible particulate emissions from the baghouse or the enclosure serving this emissions unit.

**2.b** The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B).

**2.c** This facility is located in Oakhill, Jackson County, which is a non- Appendix A area as specified in OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

**2.d** The permittee shall operate and maintain the baghouse with a control efficiency of greater than or equal to 99%.

## B. Operational Restrictions

1. This emissions unit is limited to 2340 hours of operation per rolling, 12-month period.

## B. Operational Restrictions (continued)

2. In order to ensure federal enforceability for the first 12 calendar months of operation after the effective date of this permit, this emissions unit shall not exceed the following cumulative hours of operation limits:

| MONTH(s) | Cumulative hours of operation |
|---|---|
| 1 | 195 |
| 1-2 | 390 |
| 1-3 | 585 |
| 1-4 | 780 |
| 1-5 | 975 |
| 1-6 | 1170 |
| 1-7 | 1365 |
| 1-8 | 1560 |
| 1-9 | 1755 |
| 1-10 | 1950 |
| 1-11 | 2145 |
| 1-12 | 2340 |

3. This emissions unit shall not exceed a production rate of 11.0 tons per hour as an average over each calendar month.

4. The permittee shall burn only natural gas in this emissions unit.

## C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

   a. the total tons of material processed;

   b. the total hours of operation;

   c. the calculated rolling, 12-month total of the hours of operation;

   d. the average hourly operating rate (a/b), in tons per hour; and

   e. during the first 12 months of operation after the effective date of this permit, the total cumulative hours of operation.

2. This emissions unit shall be equipped with a timer to accurately document the total hours of operation.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit and any building egress point. 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. the total duration of any visible emission incident; and

   c. any corrective actions taken to eliminate the visible emissions.

4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

## D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the rolling, 12-month hours of operation limitation specified in section B.1 of this permit (or for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation specified in section B.2).

2. The permittee shall submit quarterly deviation (excursion) reports that identify all the periods of time during which the production rate did not comply with the allowable limit specified in section B.3 of this permit.

## D. Reporting Requirements (continued)

3. The deviaiton reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.3.

4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit and/or any building egress point and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

5. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit and the total hours of operation for the previous calendar year. Each report shall be submitted by February 15 of each year.

6. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

15.4 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:

There shall be no visible particulate emissions from any baghouse or the enclosure serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined 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", as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

1.c Emission Limitation:

18.0 tons of particulate emissions per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be determined based upon the following equation:

E = (EF) (AHPR) (0.0005 ton/lb) = tpy of particulate emissions

where:

E = the total annual particulate emissions;
EF = the allowable hourly emission rate or the hourly emission rate from the most recent stack test conducted; and
AHPR = the total actual hours of production for each 12-month period as monitored and recorded in section C.1.b.

## E. Testing Requirements (continued)

**1.d** Emission Limitation:

1.0 lb/hr of sulfur dioxide

Applicable Compliance Method:

The annual emission rate shall be determined by calculation using the maximum fuel capacity (4.0 mmBtu/hr) multiplied by the emission factor of 0.000588 lb/mmBtu (AP-42, 1.4-2, 7/98):

4.0 mmBtu/hr (0.000588 lb/mmBtu) = 0.00235 lb/hr of sulfur dioxide

## F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), all of the terms and conditions in this permit are federally enforceable.