

Facility ID: 1677010027 Issuance type: Title V Final Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z100 - salt warehouse
Z200 - coal pile
Z300 - roadways/parking areas

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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- [Go to Part III for Emissions Unit B002](#)
- [Go to Part III for Emissions Unit B003](#)
- [Go to Part III for Emissions Unit B004](#)
- [Go to Part III for Emissions Unit B006](#)
- [Go to Part III for Emissions Unit P001](#)
- [Go to Part III for Emissions Unit P004](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010027 Emissions Unit ID: B001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
No. 3 coal-fired boiler vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B002,B003,B004). The boiler has a maximum heat input capacity of 43 mmBTU/hr.	OAC rule 3745-17-07	20 percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-10	0.18 pound of particulate matter per million Btu actual heat input
	OAC rule 3745-18-83(G)	***
	40 CFR 52.1881(b)(59)(iii)	4.72 pounds of sulfur dioxide per million Btu actual heat input

2. Additional Terms and Conditions

- a. *** This applicable emission limitation is less stringent than the limitation in 40 CFR Part 52.1881.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.
2. The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" wet basis:
 - a. less than 13 percent ash by weight;
 - b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.72 pounds of sulfur dioxide per mmBtu actual heat input; and
 - c. greater than 10,500 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.

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III. Monitoring and/or Record Keeping Requirements

- a. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
 - b. The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
 - c. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once every two hours (12 readings per day).
 3. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a weekly basis. Each sample shall be collected from the coal truck. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during the calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

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IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District (RAQMD) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. Quarterly reports shall be submitted that specify the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

- a. the total quantity of coal burned (tons);
- b. the average ash content (%) of the coal burned;
- c. the average sulfur content (%) of the coal burned;
- d. the average heat content (Btu/lb) of the coal burned; and
- e. the average sulfur dioxide emission rate (pounds of sulfur dioxide/mmBtu actual heat input) from the coal burned.

The reports containing this information shall be submitted on a quarterly basis within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency.

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V. **Testing Requirements**

1. Emission Limitation:

0.18 pound of particulate matter per million BTU actual heat input
4.72 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III.3 (for SO₂) and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate matter and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.18 pound of particulate matter per million BTU actual heat input and 4.72 pounds of sulfur dioxide per million BTU actual heat input emission limitations in accordance with the following requirements:

- a. the emissions testing shall be conducted during each permit cycle with no test for emissions unit B001 occurring more than 5 years from the previous testing date;
- b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulate matter and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and
- c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

The continuous opacity monitoring data shall be used to demonstrate compliance with the requirements of OAC rule 3745-17-07(A)(1). The permittee shall be deemed in compliance with OAC rule 3745-17-07(A)(1) if less than 1.5 percent of the nonexempt* 6-minute average opacity values during a calendar quarter exceed 20 percent opacity. (Historical continuous opacity monitoring data for coal-fired boilers equipped with electrostatic precipitators or baghouses indicate that an excess emissions level of 1.5 percent (nonexempt emissions) is representative of good operation and maintenance of the emissions unit and the associated control equipment.) Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) may also be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1). In the event of a discrepancy between the continuous opacity monitoring data and observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 during the same time period, the Method 9 data will take precedence for that time period.

* exempt emissions are defined in OAC rule 3745-17-07

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1677010027 Emissions Unit ID: B001 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010027 Emissions Unit ID: B002 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
No. 4 coal-fired boiler vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B003,B004). The boiler has a maximum heat input capacity of 43 mmBTU/hr.	OAC rule 3745-17-07	20 percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-10	0.18 pound of particulate matter per million Btu actual heat input
	OAC rule 3745-18-83(G)	***
	40 CFR 52.1881(b)(59)(iii)	4.72 pounds of sulfur dioxide per million Btu actual heat input

2. Additional Terms and Conditions

- a. *** This applicable emission limitation is less stringent than the limitation in 40 CFR Part 52.1881.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.
2. The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" wet basis:
 - a. less than 13 percent ash by weight;
 - b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.72 pounds of sulfur dioxide per mmBtu actual heat input; and
 - c. greater than 10,500 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.

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III. Monitoring and/or Record Keeping Requirements

- a. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- b. The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
- c. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site

and available for inspection during regular office hours.

2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once every two hours (12 readings per day).
3. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a weekly basis. Each sample shall be collected from the coal truck. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during the calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office of local air agency.

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IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District (RAQMD) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. Quarterly reports shall be submitted that specify the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal burned (tons);
 - b. the average ash content (%) of the coal burned;
 - c. the average sulfur content (%) of the coal burned;
 - d. the average heat content (Btu/lb) of the coal burned; and
 - e. the average sulfur dioxide emission rate (pounds of sulfur dioxide/mmBtu actual heat input) from the coal burned.

The reports containing this information shall be submitted on a quarterly basis within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency.

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V. Testing Requirements

1. Emission Limitation:
 - 0.18 pound of particulate matter per million BTU actual heat input
 - 4.72 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to

section A.III.3 (for SO₂) and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate matter and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.18 pound of particulate matter per million BTU actual heat input and 4.72 pounds of sulfur dioxide per million BTU actual heat input emission limitations in accordance with the following requirements:

- a. the emissions testing shall be conducted during each permit cycle with no test for emissions unit B002 occurring more than 5 years from the previous testing date;
 - b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulate matter and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and
 - c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

The continuous opacity monitoring data shall be used to demonstrate compliance with the requirements of OAC rule 3745-17-07(A)(1). The permittee shall be deemed in compliance with OAC rule 3745-17-07(A)(1) if less than 1.5 percent of the nonexempt* 6-minute average opacity values during a calendar quarter exceed 20 percent opacity. (Historical continuous opacity monitoring data for coal-fired boilers equipped with electrostatic precipitators or baghouses indicate that an excess emissions level of 1.5 percent (nonexempt emissions) is representative of good operation and maintenance of the emissions unit and the associated control equipment.) Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) may also be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1). In the event of a discrepancy between the continuous opacity monitoring data and observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 during the same time period, the Method 9 data will take precedence for that time period.

* exempt emissions are defined in OAC rule 3745-17-07

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677010027 Emissions Unit ID: B002 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010027 Emissions Unit ID: B003 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
No. 5 coal-fired boiler vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B002,B004). The boiler has a maximum heat input capacity of 43	OAC rule 3745-17-07	20 percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-10	0.18 pound of particulate matter per million Btu actual heat input

mmBTU/hr.	OAC rule 3745-18-83(G)	***
	40 CFR 52.1881(b)(59)(iii)	4.72 pounds of sulfur dioxide per million Btu actual heat input

2. **Additional Terms and Conditions**

- a. *** This applicable emission limitation is less stringent than the limitation in 40 CFR Part 52.1881.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.
2. The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" wet basis:
 - a. less than 13 percent ash by weight;
 - b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.72 pounds of sulfur dioxide per mmBtu actual heat input; and
 - c. greater than 10,500 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.

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III. **Monitoring and/or Record Keeping Requirements**

- a. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- b. The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
- c. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once every two hours (12 readings per day).
3. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a weekly basis. Each sample shall be collected from the coal truck. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during the calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office of local air agency.

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IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District (RAQMD) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. Quarterly reports shall be submitted that specify the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal burned (tons);
 - b. the average ash content (%) of the coal burned;
 - c. the average sulfur content (%) of the coal burned;
 - d. the average heat content (Btu/lb) of the coal burned; and
 - e. the average sulfur dioxide emission rate (pounds of sulfur dioxide/mmBtu actual heat input) from the coal burned.

The reports containing this information shall be submitted on a quarterly basis within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency.

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V. Testing Requirements

1. Emission Limitation:

0.18 pound of particulate matter per million BTU actual heat input
4.72 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III.3 (for SO₂) and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate matter and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.18 pound of particulate matter per million BTU actual heat input and 4.72 pounds of sulfur dioxide per million BTU actual heat input emission limitations in accordance with the following requirements:

- a. the emissions testing shall be conducted during each permit cycle with no test for emissions unit B003 occurring more than 5 years from the previous testing date;
 - b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulate matter and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and
 - c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the

testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

The continuous opacity monitoring data shall be used to demonstrate compliance with the requirements of OAC rule 3745-17-07(A)(1). The permittee shall be deemed in compliance with OAC rule 3745-17-07(A)(1) if less than 1.5 percent of the nonexempt* 6-minute average opacity values during a calendar quarter exceed 20 percent opacity. (Historical continuous opacity monitoring data for coal-fired boilers equipped with electrostatic precipitators or baghouses indicate that an excess emissions level of 1.5 percent (nonexempt emissions) is representative of good operation and maintenance of the emissions unit and the associated control equipment.) Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) may also be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1). In the event of a discrepancy between the continuous opacity monitoring data and observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 during the same time period, the Method 9 data will take precedence for that time period.

* exempt emissions are defined in OAC rule 3745-17-07

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1677010027 Emissions Unit ID: B003 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010027 Emissions Unit ID: B004 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
No. 6 coal-fired boiler vented through a baghouse filter for particulate control and subsequently vented to the atmosphere via a stack shared by the three remaining boilers (B001,B002,B003). The boiler has a maximum heat input capacity of 43 mmBTU/hr.	OAC rule 3745-17-07	20 percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-10	0.18 pound of particulate matter per million Btu actual heat input
	OAC rule 3745-18-83(G)	***
	40 CFR 52.1881(b)(59)(iii)	4.72 pounds of sulfur dioxide per million Btu actual heat input

2. Additional Terms and Conditions

- a. *** This applicable emission limitation is less stringent than the limitation in 40 CFR Part 52.1881.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.
2. The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" wet basis:
 - a. less than 13 percent ash by weight;
 - b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.72 pounds of sulfur dioxide per mmBtu actual heat input; and
 - c. greater than 10,500 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.

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III. Monitoring and/or Record Keeping Requirements

- a. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
 - b. The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
 - c. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once every two hours (12 readings per day).
 3. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a weekly basis. Each sample shall be collected from the coal truck. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during the calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

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IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District (RAQMD) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason,

and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. Quarterly reports shall be submitted that specify the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal burned (tons);
 - b. the average ash content (%) of the coal burned;
 - c. the average sulfur content (%) of the coal burned;
 - d. the average heat content (Btu/lb) of the coal burned; and
 - e. the average sulfur dioxide emission rate (pounds of sulfur dioxide/mmBtu actual heat input) from the coal burned.

The reports containing this information shall be submitted on a quarterly basis within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency.

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V. Testing Requirements

1. Emission Limitation:

0.18 pound of particulate matter per million BTU actual heat input
4.72 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III.3 (for SO₂) and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate matter and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.18 pound of particulate matter per million BTU actual heat input and 4.72 pounds of sulfur dioxide per million BTU actual heat input emission limitations in accordance with the following requirements:

- a. the emissions testing shall be conducted during each permit cycle with no test for emissions unit B004 occurring more than 5 years from the previous testing date;
- b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulate matter and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and
- c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

The continuous opacity monitoring data shall be used to demonstrate compliance with the requirements of OAC rule 3745-17-07(A)(1). The permittee shall be deemed in compliance with OAC rule 3745-17-07(A)(1) if less than 1.5 percent of the nonexempt* 6-minute average opacity values during a calendar quarter exceed 20 percent opacity. (Historical continuous opacity monitoring data for coal-fired boilers equipped with electrostatic precipitators or baghouses indicate that an excess emissions level of 1.5 percent (nonexempt emissions) is representative of good operation and maintenance of the emissions unit and the associated control equipment.) Compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) may also be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1). In the event of a discrepancy between the continuous opacity monitoring data and observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 during the same time period, the Method 9 data will take precedence for that time period.

* exempt emissions are defined in OAC rule 3745-17-07

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1677010027 Emissions Unit ID: B004 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010027 Emissions Unit ID: B006 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
No. 7 boiler is a natural gas-fired boiler with a low NOx burner. The boiler has a maximum heat input capacity of 75 million Btu/hr.	OAC rule 3745-17-07 See A.VI below.	20% opacity as a 6-minute average, except as provided by rule
	OAC rule 3745-17-10 See A.VI below.	0.020 lb/mmBtu of particulate matter
	40 CFR 60, Subpart Dc See A.VI below.	See A.III.1 below.

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor and record the natural gas usage for this emissions unit on a continuous basis.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

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

a. Emission Limitation:

0.020 lb/mmBtu of particulate matter

Applicable Compliance Method:

Particulate emissions shall be calculated using the AP-42 emission factor for particulate emissions resulting from the operation of natural gas fired fuel burning equipment. The filterable particulate emission factor of 6.2 pounds per million cubic feet shall be divided by 1000 Btu per standard cubic foot to calculate a particulate emission rate of 0.0062 pound per million Btu.

The particulate emission factor was obtained from AP-42, 5th edition, chapter 1.4, table 1.4-2.

- b. Emission Limitation:
 - 20% opacity as a 6-minute average
 - Applicable Compliance Method:
 - OAC rule 3745-17-03(B)(1)

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VI. Miscellaneous Requirements

- 1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 16-1470 issued on June 14, 1995:
 - A.I.1, A.III.1, A.V.1.a, A.V.1.b, A.VI.1, B.I.1, B.I.2, B.II.1, B.V.1.a, and B.V.1.b.

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Facility ID: 1677010027 Emissions Unit ID: B006 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
No. 7 boiler is a natural gas fired boiler with a low NOx burner. The boiler has a maximum heat input capacity of 75 million Btu/hr.	OAC rule 3745-31-05 See A.VI.	0.10 lb/mmBtu of nitrogen oxides
	OAC rule 3745-31-05 See A.VI.	4.58 lbs/hr of carbon monoxide

2. Additional Terms and Conditions

- a. The permittee shall employ low NOx burner technology in this emissions unit.

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II. Operational Restrictions

- 1. The permittee shall use only natural gas as fuel for this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

0.10 lb/mmBtu of nitrogen oxides

Applicable Compliance Method:

Divide the nitrogen oxides emission factor of 83 pounds of nitrogen oxides per million cubic feet by 1000 Btu per standard cubic foot.

The nitrogen oxides emission factor was obtained from AP-42, 5th edition, chapter 1.4, table 1.4-1.
 - b. Emission Limitation:

4.58 lbs/hr of carbon monoxide

Applicable Compliance Method:

Divide the carbon monoxide emission factor of 61 pounds of carbon monoxide per million cubic feet by 1000 Btu per standard cubic foot, and multiply by the maximum heat input of 75 million Btu per hour.

The carbon monoxide emission factor was obtained from AP-42, 5th edition, chapter 1.4, table 1.4-1.

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010027 Emissions Unit ID: P001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
Process consists of three production lines consisting of mixers, grinders, screeners and packaging units. Sodium chloride is mixed with trace minerals consisting of tricalcium phosphate, sodium ferrocyanide, sodium silicio aluminate and potassium iodide. The particulate emissions associated with these operations are vented through a SLY-JET venturi scrubber system.	OAC rule 3745-17-11	total of 7.23 pounds per hour of particulate matter
	OAC rule 3745-17-07	20% opacity as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- a. The permittee shall operate and maintain the venturi scrubber in accordance with the manufacturer's recommendations, instructions and operating manual(s).
- b. All particulate emissions from the production lines constituting this emissions unit shall be vented to the venturi scrubber.

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II. Operational Restrictions

1. While the emissions unit is in operation, the pressure drop across the scrubber (inches of water) shall be maintained within the range of plus or minus 30% of the average value determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

While the emissions unit is in operation, the scrubber liquid flow rate (gallons per minute) shall be maintained within the range of plus or minus 30% of the average value determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.

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III. Monitoring and/or Record Keeping Requirements

1. Within 90 days of the issuance of this permit, the permittee shall install equipment to continuously monitor and record the change in pressure of the gas stream across the scrubber and the scrubber liquid flow rate.
2. The permittee shall properly operate and maintain the equipment to continuously monitor and record the change in pressure of the gas stream across the scrubber and the scrubber liquid flow rate while the emissions unit is in operation. The monitoring and recording devices shall be capable of accurately measuring the desired parameters. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).

The permittee shall collect and record the following information each day:
 - a. the differential air pressure across the scrubber, on a continuous basis;
 - b. the scrubber liquid flow rate, on a continuous basis; and
 - c. a log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall maintain salt throughput records for each day this emissions unit is in operation.
4. The information required in A.III.2 and A.III.3 above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.
5. During each performance test following the installation of the monitoring equipment required in A.III.1, the permittee shall record the measurements of both the differential air pressure across the scrubber and the scrubber liquid flow rate.

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IV. Reporting Requirements

1. The permittee shall submit differential air pressure and scrubber liquid flow rate deviation (excursion) reports that identify all periods of time during which the differential air pressure and the scrubber liquid flow rate differ by more than plus or minus 30 percent from the average values determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.
2. The parameter values required to be recorded in Section A.III.5 shall be included in the comprehensive written report required in Section A.V.1.b.

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V. Testing Requirements

- a. Emission Limitation:
 1. 7.23 pounds per hour of particulate matter

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the emission testing requirement specified below.

The permittee shall conduct, or have conducted, particulate matter emission testing for this emissions unit to demonstrate compliance with the 7.23 pounds per hour emission limitation in accordance with the following requirements:
 - a. the emissions testing shall be conducted within 3 months after issuance of the permit and, thereafter, during each permit cycle with no test for emissions unit P001 occurring more than 5 years from the previous testing date;

b. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate for particulate matter: Methods 1 through 5 of 40 CFR Part 60, Appendix A; and

c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

- b. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

2. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined by visible particulate emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Method 9.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1677010027 Emissions Unit ID: P001 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010027 Emissions Unit ID: P004 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
The nugget production operation consists of a salt compactor, screener, cooler and packaging operation. The process air from the nugget press is vented through a SLY-JET venturi scrubber. The process air from the cooling system is vented through a separate Fisher Klosterman venturi scrubber.	OAC rule 3745-31-05 See A.VI below. OAC rule 3745-17-07 See A.VI below. OAC rule 3745-17-11 See A.VI below.	See A.I.2.a below. 20% opacity as a six-minute average, except as provided by rule total of 9.79 pounds per hour of particulate matter from the entire operation

2. Additional Terms and Conditions

- a. The total particulate matter emission limitation shall be calculated using OAC rule 3745-17-11, Figure II.
- b. All particulate emissions shall be vented to either the W.W. Sly No. 175 venturi scrubber identified as collector "A" or the Fisher-Klosterman MS-600-H venturi scrubber identified as collector "B".

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II. Operational Restrictions

- 1. While the emissions unit is in operation, the pressure drop across the scrubbers identified as collectors "A" and "B" shall be maintained within the range of plus or minus 30% of the average values, in inches of water, as determined in section A.III.2 below or as determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations after monitor

installation.

While the emissions unit is in operation, the scrubber liquid flow rates for the scrubbers identified as collectors "A" and "B" shall be maintained within the range of plus or minus 30% of the average values, in gallons per minute, as determined in section A.III.2 below or as determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations after monitor installation.

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III. Monitoring and/or Record Keeping Requirements

1. Within 90 days of the issuance of this permit, the permittee shall install and calibrate equipment to continuously monitor and record the change in pressure of the gas stream across each scrubber and the scrubber liquid flow rates. The monitoring devices and recorder(s) shall be installed and calibrated in accordance with the manufacturer's recommendations, instructions and operating manual(s).

The pressure drop monitoring devices shall be certified by the manufacturer to be accurate within plus or minus 250 pascals or plus or minus 1 inch water gauge pressure.

The scrubber liquid flow rate monitoring devices shall be certified by the manufacturer to be accurate within plus or minus 5% of the design scrubber liquid flow rate.

2. Within 120 days of the issuance of this permit, the permittee shall establish average values for the pressure drop across the scrubbers and the scrubber liquid flow rates for the scrubbers identified as "A" and "B" using the identical operating conditions which occurred during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.
3. The permittee shall properly operate and maintain the equipment to continuously monitor and record the change in pressure of the gas stream across each scrubber and the scrubber liquid flow rates while the emissions unit is in operation. The monitoring devices and recorder(s) shall be operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).

The pressure drop and scrubber liquid flow rate monitoring devices shall be calibrated on an annual basis in accordance with the manufacturer's instructions.

4. The permittee shall collect and record the following information each day:
 - a. the differential air pressure across each scrubber, on a continuous basis;
 - b. the scrubber liquid flow rates, on a continuous basis; and
 - c. a log or record of the downtime for the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation.
5. The permittee shall maintain salt throughput records for each day this emissions unit is in operation.
6. The information required in A.III.4 and A.III.5 above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.
7. During each performance test following the installation of the monitoring equipment required in A.III.1, the permittee shall continuously record for each scrubber the measurements of both the differential air pressure across the scrubber and the scrubber liquid flow rate.

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IV. Reporting Requirements

1. The permittee shall submit differential air pressure and scrubber liquid flow rate deviation (excursion) reports that identify all periods of time during which the differential air pressures and the scrubber liquid flow rates differ by more than plus or minus 30 percent from the average values as determined in Section A.III.2 above or as determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations after monitor installation.
2. The parameter values required to be established by Section A.III.2 shall be reported to the Akron RAQMD within 30 days after the values are determined.
3. The parameter values required to be recorded by Section A.III.7 shall be included in the comprehensive written report required in Section A.V.1.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. the emissions testing shall be conducted during each permit cycle with no test for emissions unit P004 occurring more than 5 years from the previous testing date;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission

rate for particulates;

c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and

d. the test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

2. Emission Limitation:

9.79 pounds per hour of particulate matter

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined by visible particulate emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Method 9.

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VI. **Miscellaneous Requirements**

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 16-1117 issued on May 20, 1992:

A.I.1, A.I.2, A.II.1, A.III.1-7, A.IV.1-3, A.V.1-3, A.VI.1, B.I.1, B.I.2, B.V.1 and B.V.2.

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Facility ID: 1677010027 Emissions Unit ID: P004 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
The nugget production operation consists of	OAC rule 3745-31-05	0.80 lb/hr of PM10

- a salt compactor, screener, cooler and packaging operation. The process air from the nugget press is vented through a SLY-JET venturi scrubber. The process air from the cooling system is vented through a separate Fisher Klosterman venturi scrubber. See A.VI.
2. **Additional Terms and Conditions**
- a. The permittee shall operate and maintain each wet scrubber in accordance with the respective manufacturer's recommendations, instructions and operating manual(s).

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- the emissions testing shall be conducted during each permit cycle with no test for emissions unit P004 occurring more than 5 years from the previous testing date;
 - the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PM10;
 - the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for PM10, Method 201A of 40 CFR Part 51, Appendix M; and
 - the test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.
2. Emission Limitation:
- 0.80 lb/hr of PM10
- Applicable Compliance Method:
- Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 51, Appendix M, Method 201A.

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010027 Emissions Unit ID: P006 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
Salt slurry is heated through the use of natural gas fired vacuum pans and a filter drum dryer. The moisture in the salt slurry is evaporated during this operation. The process air is vented to the atmosphere through a silencer to control noise.	OAC rule 3745-17-11	9.63 pounds per hour of particulate matter
	OAC rule 3745-17-07	20% opacity as a six-minute average, except as provided by rule, for stack emissions
		20% opacity as a three-minute average for fugitive emissions

2. Additional Terms and Conditions

- a. The permittee shall operate and maintain the Fan Engineering Corp., model 93-1054, wet collector in accordance with the manufacturer's recommendations, instructions and operating manual(s).

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II. Operational Restrictions

1. While the emissions unit is in operation, the water flow to the wet collector shall be maintained within the range of plus or minus 30% of the average value, in gallons per minute, as determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations after monitor installation.

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III. Monitoring and/or Record Keeping Requirements

1. Within 90 days of the issuance of this permit, the permittee shall install and calibrate equipment to continuously monitor the water flow rate to the wet collector. The water flow rate to the wet collector shall be permanently recorded once per shift. The monitoring device shall be installed and calibrated in accordance with the manufacturer's recommendations, instructions and operating manual(s).
2. The permittee shall properly operate and maintain equipment to continuously monitor the water flow rate to the wet collector while the emissions unit is in operation. The monitoring device shall be operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).
3. The permittee shall collect and record the following information each day:
 - a. the water flow rate to the wet collector, on a once per shift basis; and
 - b. a log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall maintain salt throughput records for each day this emissions unit is in operation.
5. The information required in A.III.3 and A.III.4 above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.
6. During each performance test following the installation of the monitoring equipment required in A.III.1, the permittee shall record the measurement of the water flow rate to the wet collector.

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IV. Reporting Requirements

1. The permittee shall submit water flow rate deviation (excursion) reports that identify all periods of time during which the water flow rate to the wet collector differs by more than plus or minus 30 percent from the average value determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations.
2. The parameter value required to be recorded by Section A.III.6 shall be included in the comprehensive written report required in Section A.V.1.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. the emissions testing shall be conducted within 3 months after issuance of the permit and, thereafter, during each permit cycle with no test for emissions unit P006 occurring more than 5 years from the previous testing date;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates;
 - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and
 - d. the test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.
2. Emission Limitation:

9.63 pounds per hour of particulate matter

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).
3. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1677010027 Emissions Unit ID: P006 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1677010027 Emissions Unit ID: P902 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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
Production of compacted salt for water softener regeneration. The operation consists of a flake breaker, conveyor, elevator, screener, storage bin and packaging operation. The process air from the DuraCube production line is vented through a Fisher-Klosterman venturi scrubber. The process air from the cooling system is vented through a separate Fisher-Klosterman venturi scrubber.	OAC rule 3745-31-05 See A.VI below.	See A.V.1 below.
	OAC rule 3745-17-07 See A.VI below.	See A.I.2.b below.
	OAC rule 3745-17-08 See A.VI below.	See A.I.2.b, A.I.2.c and A.I.2.e below.
	OAC rule 3745-17-11 See A.VI below.	See A.I.2.c below.
	40 CFR Part 60, Subpart OOO See A.VI below.	See A.I.2.b, A.I.2.d and A.I.2.e below.

2. **Additional Terms and Conditions**

- a. The permittee shall operate and maintain the venturi scrubbers in accordance with the manufacturer's recommendations, instructions and operating manual(s).
- b. In accordance with the requirements of 40 CFR 60.672(a)(2), due to the wet scrubbing control device, the stack opacity limit is waived and the permittee shall comply with the recordkeeping and reporting provisions of 40 CFR 60.676(c), (d) and (e).
- c. The particulate emission rate limitation required by 40 CFR 60.672(a)(1) is more stringent than the particulate emission rate limitations required by OAC rule 3745-17-08(B)(3)(b) and OAC rule 3745-17-11.
- d. The stack particulate emission rate shall not exceed 0.05 gram per dry standard cubic meter, as required by 40 CFR 60.672(a)(1).
- e. No visible, fugitive particulate emissions shall be emitted from the building enclosing this emissions unit.
- f. The Fisher-Klosterman M.S.-550-H venturi scrubber is identified as collector"A" and the Fisher-Klosterman M.S.-400 venturi scrubber is identified as collector"B".

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II. **Operational Restrictions**

1. While the emissions unit is in operation, the pressure drop across the scrubbers identified as collectors "A" and "B" shall be maintained within the range of plus or minus 30% of the average values, in inches of water, as determined in section A.III.2 below or as determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations after monitor installation.

While the emissions unit is in operation, the scrubber liquid flow rates for the scrubbers identified as collectors "A" and "B" shall be maintained within the range of plus or minus 30% of the average values, in gallons per minute, as determined in section A.III.2 below or as determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations after monitor installation.

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III. **Monitoring and/or Record Keeping Requirements**

1. Within 90 days of the issuance of this permit, the permittee shall install and calibrate equipment to continuously monitor and record the change in pressure of the gas stream across each scrubber and the scrubber liquid flow rates. The monitoring devices and recorder(s) shall be installed and calibrated in accordance with the manufacturer's recommendations, instructions and operating manual(s).

The pressure drop monitoring devices shall be certified by the manufacturer to be accurate within plus or minus 250 pascals or plus or minus 1 inch water gauge pressure.

The scrubber liquid flow rate monitoring devices shall be certified by the manufacturer to be accurate within plus or minus 5% of the design scrubber liquid flow rate.

2. Within 120 days of the issuance of this permit, the permittee shall establish average values for the pressure drop across the scrubbers and the scrubber liquid flow rates for the scrubbers identified as "A" and "B" using the identical operating conditions which occurred during the most recent performance test that

demonstrated the emissions unit was in compliance with applicable emissions limitations.

3. The permittee shall properly operate and maintain the equipment to continuously monitor and record the change in pressure of the gas stream across each scrubber and the scrubber liquid flow rates while the emissions unit is in operation. The monitoring devices and recorder(s) shall be operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).

The pressure drop and scrubber liquid flow rate monitoring devices shall be calibrated on an annual basis in accordance with the manufacturer's instructions.
4. The permittee shall collect and record the following information each day:
 - a. the differential air pressure across each scrubber, on a continuous basis;
 - b. the scrubber liquid flow rates, on a continuous basis; and
 - c. a log or record of the downtime for the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation.
5. The permittee shall maintain salt throughput records for each day this emissions unit is in operation.
6. The information required in A.III.4 and A.III.5 above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.
7. During each performance test following the installation of the monitoring equipment required in A.III.1, the permittee shall record for each scrubber the measurements of both the differential air pressure across the scrubber and the scrubber liquid flow rate.

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IV. Reporting Requirements

1. The permittee shall submit differential air pressure and scrubber liquid flow rate deviation (excursion) reports that identify all periods of time during which the differential air pressures and the scrubber liquid flow rates differ by more than plus or minus 30 percent from the average values as determined in Section A.III.2 above or as determined during the most recent performance test that demonstrated the emissions unit was in compliance with applicable emissions limitations after monitor installation.
2. The parameter values required to be established by Section A.III.2 shall be reported to the Akron RAQMD within 30 days after the values are determined.
3. The parameter values required to be recorded by Section A.III.7 shall be included in the comprehensive written report required in Section A.V.1.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. the emissions testing shall be conducted during each permit cycle with no test for emissions unit P902 occurring more than 5 years from the previous testing date;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates;
 - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and
 - d. the test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.
2. Emission Limitation:
 - 0.05 g/dscm of particulate matter

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

3. Emission Limitation:

no visible particulate emissions

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Method 22

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VI. **Miscellaneous Requirements**

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 16-1523 issued on February 22, 1996:

A.I.1, A.I.2, A.II.1, A.III.1-7, A.IV.1-3, A.V.1-3, A.VI.1, B.I.1, B.I.2 and B.V.1-4.

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Facility ID: 1677010027 Emissions Unit ID: P902 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
Production of compacted salt for water softener regeneration. The operation consists of a flake breaker, conveyor, elevator, screener, storage bin and packaging operation.	OAC rule 3745-31-05 See A.VI.	See B.I.2.a, B.I.2.b, B.I.2.c and B.I.2.d below.

2. **Additional Terms and Conditions**

- a. The permittee shall vent all particulate matter emissions from the process equipment to the venturi scrubbers.
- b. Particulate emissions from emissions unit P902 shall not exceed 4.0 pounds per hour.
- c. PM10 emissions from emissions unit P902 shall not exceed 1.4 pounds per hour.
- d. The visible particulate emissions from emissions unit P902 shall not exceed 5.0% opacity as a six-minute average. If the permittee complies with the recordkeeping and reporting requirements listed in A.I.2.b, the 5% opacity limitation shall not be applicable.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. the emissions testing shall be conducted during each permit cycle with no test for emissions unit P902 occurring more than 5 years from the previous testing date;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for total particulates and PM10;
 - c. the following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for PM10, Method 201A of 40 CFR Part 51, Appendix M; and
 - d. the test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.
2. Emission Limitation:

1.4 lbs/hr of PM10

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 51, Appendix M, Method 201A.
3. Emission Limitation:

4.0 lbs/hr of particulate matter

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulate matter shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).
4. Emission Limitation:

5% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined by visible particulate emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Method 9.

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VI. **Miscellaneous Requirements**

1. None