

Facility ID: 1677130034 Issuance type: Final State Permit To Operate

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

[Go to Part II for Emissions Unit P002](#)  
[Go to Part II for Emissions Unit P003](#)

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Facility ID: 1677130034 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 (NOx Cylinder Purge) draining of residual nitrogen oxides (NOx) from compressed gas cylinders, air emissions of NOx vented to and controlled by a wet scrubber	OAC rule 3745-31-05(A)(3) (PTI 16-02143)	2.0 pounds/hour & 8.8 tons/year of NOx  Air emissions of NOx shall be properly contained and vented to a wet scrubber system; the containment system shall be sufficient to essentially eliminate fugitive emissions of NOx from the emissions unit to the extent possible with good engineering design; and the wet scrubber system shall be properly operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

**2. Additional Terms and Conditions**

- (a) The hourly and annual NOx emission limits are based upon the potential to emit. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

1. All NOx emissions shall be vented to the scrubber at all times while the emissions unit is operating.
2. The pressure drop across the scrubber shall be continuously maintained within the operating range specified by the manufacturer, in inches of water, at all times while the emissions unit is in operation. Operation of the scrubber outside of this specified range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.
3. The scrubber water flow rate shall be maintained at the manufacturer's recommended value, in gallons per minute, at all times while the emissions unit is in operation.
4. The pH of the scrubber liquor shall be maintained within the operating range recommended by the manufacturer.

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

1. The permittee shall document when the wet scrubber system was not in service when the emissions unit was in operation.
2. The permittee shall employ properly installed, calibrated, operated and maintained equipment, in accordance with the manufacturer's recommendations, instructions and operating manuals, to monitor the pH of the scrubber liquor and continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation.
3. The permittee shall collect and record the following information each day the emissions unit is operating:
  - a. the static pressure drop across the scrubber, in inches of water, on a once per shift basis;
  - b. the scrubber water flow rate, in gallons per minute, on a once per shift basis;
  - c. the pH of the scrubber liquor on a once per shift basis; and

- c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the wet scrubber system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate District Office or local air agency) that identify all periods of time during which the following scrubber parameters were not maintained at or within the required levels:
  - a. the pressure drop across the scrubber;
  - b. the scrubber water flow rate; and
  - c. the pH of the scrubber liquor.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations: 2.0 pounds/hour & 8.8 tons/year of NOx

Applicable Compliance Method: The above emission limitations are based on the potential to emit, as demonstrated below:

$$E_h = (P_{max})(EF); \text{ and}$$

$$E_y = (E_h)(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ lbs})$$

Where,

$E_h$  = 2.0 pounds/hour of NOx [hourly potential to emit];  
 $E_y$  = 8.8 tons/year of NOx [yearly potential to emit];  
 $P_{max}$  = 2.5 cylinders/hour [maximum hourly cylinder process rate];  
 $EF$  = 0.8 pound of NOx/cylinder [NOx emission factor determined from application].

If necessary, the permittee may be required to demonstrate compliance of the above limitations by testing in accordance with the procedures specified in US EPA Method 7E.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 1677130034 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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P003 (Cylinder Blaster) shot blast cleaning of compressed gas cylinder exteriors, process cyclone recycles shot blast material, air emissions of particulate matter (PM) vented to and controlled by a baghouse

OAC rule 3745-17-07  
OAC rule 3745-17-11

5% opacity from any stack, as a 6-minute average

0.5 pound/hour & 2.2 tons/year of PM

Air emissions of PM shall be properly contained by an enclosure system and vented to a baghouse; the enclosure system shall be sufficient to essentially eliminate visible particulate emissions of fugitive dust from the emissions unit to the extent possible with good engineering design; and the baghouse shall be properly operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The emission limitations required by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05.

**2. Additional Terms and Conditions**

- (a) The above hourly PM emission limitation (regulated per OAC rule 3745-31-05) is greater than the potential to emit for this emissions unit, as determined from permit application data. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with this emission limit.

**B. Operational Restrictions**

- 1. The permittee shall employ the baghouse at all times this emissions unit is in operation.
- 2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse shall be continuously maintained within the operating range specified by the manufacturer, in inches of water, at all times while the emissions unit is in operation. Operation of the baghouse outside of this specified range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

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

- 1. The permittee shall document when the baghouse system was not in service when the emissions unit was in operation.
- 2. The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- 3. The permittee shall record the pressure drop across the baghouse on a daily basis.

**D. Reporting Requirements**

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the baghouse was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
- 2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above.
- 3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation: 5% opacity from any stack, as a 6-minute average  
  
Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).  
Emission Limitations: 0.5 pound/hour & 2.2 tons/year of PM  
  
Applicable Compliance Method: The above emission limitations are greater than the potential to emit, as demonstrated below:  
  
 $E_h = (P_{max})(EF)$ ; and  
 $E_y = (E_h)(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ lbs})$   
  
Where,  
  
 $E_h = 0.182 \text{ pound/hour of PM [hourly potential to emit];}$   
 $E_y = 0.797 \text{ ton/year of PM [yearly potential to emit];}$   
 $P_{max} = 10 \text{ cylinders/hour [maximum hourly cylinder process rate];}$   
 $EF = 0.0182 \text{ pound of PM/cylinder [PM emission factor determined from application].}$

If necessary, the permittee may be required to demonstrate compliance of the above limitation by testing in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.