

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 01-12208

A. Source Description

Shelly Plant 62 located in Lancaster, has submitted a Permit to Install (PTI) application which includes proposed federally enforceable limits in order to effectively restrict the Potential to Emit (PTE) of two new emissions units below those levels which trigger major New Source review. These two new emissions units are both 750 HP diesel fired pump engines and are known as B003 and B004

B. Facility Emissions and Attainment Status

The current PTE of B003 and B004 ,based upon 8760 hours of operation, is above 100 tons/year for NOx. Plant 62's current PTE, based upon 8760 hours per year of operation, is described below.

<u>E.U.</u>	<u>NOx PTE(TPY)</u>	<u>CO PTE(TPY)</u>	<u>VOC PTE(TPY)</u>	<u>SO2 PTE(TPY)</u>	<u>PM PTE(TPY)</u>	
P901	19.5	73.5	19.8	31.4	7.02	
B003	78.84	19.84	2.54	13.27	2.32	
B004	78.84	19.84	2.54	13.27	2.32	
Total	177.18	113.18		24.88	57.94	11.66

Due to the proposed operational restriction of 2770 hours of operation per 12 month rolling period, the PTE of B003 and B004, upon issuance of the PTI, will be as described below.

<u>E.U.</u>	<u>NOx PTE(TPY)</u>	<u>CO PTE(TPY)</u>	<u>VOC PTE(TPY)</u>	<u>SO2 PTE(TPY)</u>	<u>PM PTE(TPY)</u>
P901	19.5	73.5	19.8	31.4	7.02
B003	24.93	6.28	0.73	4.20	0.74
B004	24.93	6.28	0.73	4.20	0.74
Total	69.36	86.06	21.26	39.8	8.5

Therefore, Plant 62's facility-wide PTE upon issuance of the PTI will be as described below:

<u>E.U.</u>	<u>NOx PTE(TPY)</u>	<u>CO PTE(TPY)</u>	<u>VOC PTE(TPY)</u>	<u>SO2 PTE(TPY)</u>	<u>PM PTE(TPY)</u>
P901	19.5	73.5	19.8	31.4	7.02
B003	24.93	6.28	0.73	4.20	0.74
B004	24.93	6.28	0.73	4.20	0.74
Total PTE	69.36	86.06	21.26	39.8	8.5

C. Source Emissions

The facility and the Ohio EPA have agreed to short term emission restrictions and operational restrictions which correspond to maximum annual emissions below those levels which trigger Title V permitting requirements. The facility has records to demonstrate that this plant has historically

not exceeded 2770 hours of operation per 12 month rolling period for several years.

D. Conclusion

The operation of emissions units in accordance with the terms and conditions of the proposed PTI will result in maximum annual facility emissions below those levels which trigger Title V permitting requirements.

The proposed PTI includes federally enforceable limits, record keeping, reporting and production limitations to ensure continued compliance with the PTI's requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
FAIRFIELD COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

Application No: 01-12208

Fac ID: 0123000206

DATE: 2/12/2008

Shelly Materials Plant 62
Katherine Beach
301 Frank Road 8775 Blackbird Ln
Columbus, OH 43207

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: USEPA

CDO

KY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **01-12208** FOR AN AIR CONTAMINANT SOURCE FOR
Shelly Materials Plant 62

On 2/12/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Shelly Materials Plant 62**, located at **3232 Lancaster Logan Rd, Lancaster**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-12208:

Diesel fired pump.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 122 South Front St, P.O. Box 1049, Columbus, OH 43216-1049 [(614)728-3778]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-12208

Application Number: 01-12208
Facility ID: 0123000206
Permit Fee: **To be entered upon final issuance**
Name of Facility: Shelly Materials Plant 62
Person to Contact: Katherine Beach
Address: 301 Frank Road 8775 Blackbird Ln
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3232 Lancaster Logan Rd
Lancaster, Ohio**

Description of proposed emissions unit(s):
Diesel fired pump.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Shelly Materials Plant 62

PTI Application: 01-12208

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0123000206

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

Shelly Materials Plant 62
PTI Application: 01-12208

Facility ID: 0123000206

Issued: To be entered upon final issuance

regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

Shelly Materials Plant 62**PTI Application: 01-12208****Issued: To be entered upon final issuance****Facility ID: 0123000206**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of

Shelly Materials Plant 62
PTI Application: 01-12208
Issued: To be entered upon final issuance
Construction

Facility ID: 0123000206

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only) TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	49.86
CO	12.56
OC	1.46
SO2	8.04
PM	1.48

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (B003) - Diesel fired pump 1

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Nitrogen oxide (NO _x) emissions shall not exceed 18.0 pounds per hour and 24.93 tons per year. Carbon monoxide (CO) emissions shall not exceed 4.53 pounds per hour and 6.28 tons per year. Volatile Organic Compound (VOC) emissions shall not exceed 0.53 pound per hour and 0.73 ton per year. Sulfur Dioxide (SO ₂) emissions shall not exceed 3.03 pound per hour and 4.2 ton per year. Particulate emissions shall not exceed 0.53 pound per hour and 0.74 ton per year. Visible particulate emissions shall not exceed 10% opacity. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11(B)(5)
OAC rule 3745-17-07(A)	The emissions limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)(5)	The emissions limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(B)	See II.A.2.b below.
OAC rule 3745-21-07(B)	See II.A.2.a below.

Issued: To be entered upon final issuance

Emissions Unit ID: **B003**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b** OAC rule 3745-18-06(B) exempts stationary internal combustion engines which have rated heat input capacities equal to, or less than, 10 mmBtu/hr from the sulfur dioxide emission limit in OAC rule 3745-18-06(G). This emissions unit has a rated heat input of less than 10 MMBTU/hr.
- 2.c** At the discretion and following the approval of the director, the permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI) providing the appropriate exemption requirements have been met. Pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the director may issue a "Notice of Site Approval" for any pre-disclosed location(s) if the portable source meets the requirements of OAC rule 3745-31-05(E), as follows:
- i. the portable source is operating pursuant to a currently effective permit to install (PTI) and/or any applicable permit to operate (PTO) and continues to comply with the requirements of this permit and any applicable state and/or federal rules;
 - ii. the portable source has been issued a PTI and the permittee continues to comply with the requirements of the permit including any applicable best available technology (BAT) determination;
 - iii. the portable source owner has identified the proposed site(s) to the Ohio EPA;
 - iv. the Ohio EPA has determined that the portable source will have an acceptable environmental impact at the proposed site(s);
 - v. a public notice, meeting the requirements OAC rule 3745-47, is published in the county where the proposed site(s) is/are located;
 - vi. the owner of the proposed site(s) (if not the permittee) has provided the portable source owner with approval, or an equivalent declaration, that it is acceptable to move the portable source to the proposed site(s); and

Emissions Unit ID: **B003**

- vii. the permittee has provided the Ohio EPA with a minimum of a 15-day written notice of the relocation*.

The portable source can be relocated upon receipt of the director's "Notice of Site Approval" for the site. Any site approval(s) issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal. Pursuant to OAC rule 3745-31-05(F), the director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

- 2.d** If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745- 77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 2770 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative operating hours in the following table:

Maximum Allowable

Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Cumulative Operating Hours</u>
1	462
1-2	924
1-3	1386
1-4	1848
1-5	2310
1-6	2770
1-7	2770
1-8	2770
1-9	2770
1-10	2770
1-11	2770
1-12	2770

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cumulative operating hour limitation shall be based upon a rolling, 12-month summation of the hours of operation.

2. The permittee shall burn only no. 2 fuel oil or diesel fuel in this emissions unit.
3. The quality of the no. 2 fuel oil and diesel fuel burned in this emissions unit shall meet a sulfur content which is equal to or less than 0.5 weight percent sulfur on an "as burned" basis.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month.
 - b. During the first 12 calendar months of operation, the permittee shall record the cumulative hours of operation for each calendar month.
 - c. The rolling, 12-month summation of the operating hours.
 - d. The type of fuel burned.
2. For each day during which the permittee burns a fuel other than no. 2 fuel oil or diesel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Emissions Unit ID: **B003**

3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of any oil that is received for burning in this emission unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon approval by the Ohio EPA, Central District Office.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours.
 - b. Any exceedance of the rolling 12-month maximum allowable cumulative operating hours.
 - c. Any exceedance of the sulfur content fuel restriction specified in Section B.3.

These reports are due by the date described in Part 1- General Terms and Condition of this permit under section (A)(2).

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than no. 2 fuel oil was burned in the emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which records were not maintained on the amount of no. 2 fuel oil combusted in the emissions unit. These reports are due by the date described in Part 1- General Terms and Condition of this permit under section (A)(2).

E. Testing Requirements

1. Compliance with the emission limitations and of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: NO_x emissions shall not exceed 18.0 pounds per hour.

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Applicable Compliance Method: Compliance shall be determined by multiplying the maximum engine horsepower (750 hp) by 0.024 (lb/hp-hr emission factor for NO_x; AP-42 10/96 Table 3.4-1). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 7E.

- b. Emission Limitation: CO emissions shall not exceed 4.53 pounds per hour.

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum engine heat input rating (5.33 MMBTU/hr) by 0.85 (lb/MMBTU emission factor for CO; AP-42 10/96 Table 3.4-1). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 10.

- c. Emission Limitation: VOC emissions shall not exceed 0.53 pound per hour.

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum engine horsepower (750 hp) by 0.000705 (lb/hp-hr emission factor for VOC; AP-42 10/96 Table 3.4-1). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 18.

- d. Emission Limitation: SO₂ emissions shall not exceed 3.03 pounds per hour.

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum engine horsepower (750 hp) by 0.004045 (lb/hp-hr emission factor for SO_x ; AP-42 10/96 Table 3.4-1). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 6C.

- e. Emission Limitation: The particulate emissions shall not exceed 0.53 pound per hour.

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum engine horsepower (750 hp) by 0.0007 (lb/hp-hr emission factor for PM ; AP-42 10/96 Table 3.4-1). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- f. Emission Limitation: Visible particulate emissions shall not exceed 10% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- g. Emission Limitations: NO_x emissions shall not exceed 24.93 tons per year, CO emissions

Emissions Unit ID: **B003**

shall not exceed 6.28 tons per year, VOC emissions shall not exceed 0.73 tons per year, and SO₂ emissions shall not exceed 4.2 tons per year and PM emissions shall not exceed 0.74 ton per year.

Applicable Compliance Method: Compliance with these annual limitations shall be assumed as long as compliance with the hourly emissions limitations and annual hours of operation limitation is maintained (the annual limitations were calculated by multiplying by 2000, and then dividing by 2000).

- h. Emission Limitation: The quality of the no. 2 fuel oil burned in this emissions unit shall meet a sulfur content which is equal to or less than 0.5 weight percent sulfur on an "as burned" basis.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping requirements pursuant to section C.3 above.

F. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (B004) - Diesel fired pump 2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Nitrogen oxide (NO_x) emissions shall not exceed 18.0 pounds per hour and 24.93 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 4.53 pounds per hour and 6.28 tons per year.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.53 pound per hour and 0.73 ton per year.</p> <p>Sulfur Dioxide (SO₂) emissions shall not exceed 3.03 pound per hour and 4.2 ton per year.</p> <p>Particulate emissions shall not exceed 0.53 pound per hour and 0.74 ton per year.</p> <p>Visible particulate emissions shall not exceed 10% opacity.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11(B)(5)</p>
OAC rule 3745-17-07(A)	The emissions limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)(5)	The emissions limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(B)	See II.A.2.b below.
OAC rule 3745-21-07(B)	See II.A.2.a below.

Issued: To be entered upon final issuance

Emissions Unit ID: **B004**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b** OAC rule 3745-18-06(B) exempts stationary internal combustion engines which have rated heat input capacities equal to, or less than, 10 mmBtu/hr from the sulfur dioxide emission limit in OAC rule 3745-18-06(G). This emissions unit has a rated heat input of less than 10 MMBTU/hr.
- 2.c** At the discretion and following the approval of the director, the permittee may relocate the portable source within the State of Ohio without first obtaining a permit to install (PTI) providing the appropriate exemption requirements have been met. Pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the director may issue a "Notice of Site Approval" for any pre-disclosed location(s) if the portable source meets the requirements of OAC rule 3745-31-05(E), as follows:
- i. the portable source is operating pursuant to a currently effective permit to install (PTI) and/or any applicable permit to operate (PTO) and continues to comply with the requirements of this permit and any applicable state and/or federal rules;
 - ii. the portable source has been issued a PTI and the permittee continues to comply with the requirements of the permit including any applicable best available technology (BAT) determination;
 - iii. the portable source owner has identified the proposed site(s) to the Ohio EPA;
 - iv. the Ohio EPA has determined that the portable source will have an acceptable environmental impact at the proposed site(s);
 - v. a public notice, meeting the requirements OAC rule 3745-47, is published in the county where the proposed site(s) is/are located;
 - vi. the owner of the proposed site(s) (if not the permittee) has provided the portable source owner with approval, or an equivalent declaration, that it is acceptable to move the portable source to the proposed site(s); and

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- vii. the permittee has provided the Ohio EPA with a minimum of a 15-day written notice of the relocation*.

The portable source can be relocated upon receipt of the director's "Notice of Site Approval" for the site. Any site approval(s) issued by the Ohio EPA, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), shall be valid for no longer than 3 years and are subject to renewal. Pursuant to OAC rule 3745-31-05(F), the director may modify the site approval to add or delete certain portable sources or add or delete certain terms and conditions as appropriate.

- 2.d** If the relocation of the portable source would result in the installation of a major source or the modification of a major source, as defined in OAC rule 3745-31-01, the permittee shall submit an application and obtain a PTI for the new location prior to moving the portable source.

When a portable source is located at a stationary source or at a site with multiple portable sources, the potential emissions of the portable source may be required to be added to that of the facility, in order to determine the potential to emit for Title V and PSD applicability. Relocation of any portable source that results in the creation of a major source, as defined in OAC rule 3745- 77-01, must also meet all applicable requirements under the Title V program contained in OAC rule 3745-77, which may include the requirement to apply for a Title V permit.

The "Notice of Intent to Relocate" shall be submitted to the Ohio EPA District Office or local air agency responsible for issuing the permits for the portable source. Upon receipt of the notice, the permitting office shall notify the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site. Failure to submit said notification or failure to receive Ohio EPA approval prior to relocation of the portable source may result in fines and civil penalties.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 2770 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative operating hours in the following table:

Maximum Allowable

Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Cumulative Operating Hours</u>
1	462
1-2	924
1-3	1386
1-4	1848
1-5	2310
1-6	2770
1-7	2770
1-8	2770
1-9	2770
1-10	2770
1-11	2770
1-12	2770

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cumulative operating hour limitation shall be based upon a rolling, 12-month summation of the hours of operation.

2. The permittee shall burn only no. 2 fuel oil or diesel fuel in this emissions unit.
3. The quality of the no. 2 fuel oil and diesel fuel burned in this emissions unit shall meet a sulfur content which is equal to or less than 0.5 weight percent sulfur on an "as burned" basis.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month.
 - b. During the first 12 calendar months of operation, the permittee shall record the cumulative hours of operation for each calendar month.
 - c. The rolling, 12-month summation of the operating hours.
 - d. The type of fuel burned.
2. For each day during which the permittee burns a fuel other than no. 2 fuel oil or diesel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Emissions Unit ID: **B004**

3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of any oil that is received for burning in this emission unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon approval by the Ohio EPA, Central District Office.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours.
 - b. Any exceedance of the rolling 12-month maximum allowable cumulative operating hours.
 - c. Any exceedance of the sulfur content fuel restriction specified in Section B.3.

These reports are due by the date described in Part 1- General Terms and Condition of this permit under section (A)(2).

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than no. 2 fuel oil was burned in the emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which records were not maintained on the amount of no. 2 fuel oil combusted in the emissions unit. These reports are due by the date described in Part 1- General Terms and Condition of this permit under section (A)(2).

E. Testing Requirements

1. Compliance with the emission limitations and of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: NO_x emissions shall not exceed 18.0 pounds per hour.

Issued: To be entered upon final issuance

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum engine horsepower (750 hp) by 0.024 (lb/hp-hr emission factor for NO_x; AP-42 10/96 Table 3.4-1). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 7E.

- b. Emission Limitation: CO emissions shall not exceed 4.53 pounds per hour.

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum engine heat input rating (5.33 MMBTU/hr) by 0.85 (lb/MMBTU emission factor for CO; AP-42 10/96 Table 3.4-1). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 10.

- c. Emission Limitation: VOC emissions shall not exceed 0.53 pound per hour.

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum engine horsepower (750 hp) by 0.000705 (lb/hp-hr emission factor for VOC; AP-42 10/96 Table 3.4-1). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 18.

- d. Emission Limitation: SO₂ emissions shall not exceed 3.03 pounds per hour.

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum engine horsepower (750 hp) by 0.004045 (lb/hp-hr emission factor for SO_x ; AP-42 10/96 Table 3.4-1). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 6C.

- e. Emission Limitation: The particulate emissions shall not exceed 0.53 pound per hour.

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum engine horsepower (750 hp) by 0.0007 (lb/hp-hr emission factor for PM ; AP-42 10/96 Table 3.4-1). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- f. Emission Limitation: Visible particulate emissions shall not exceed 10% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- g. Emission Limitations: NO_x emissions shall not exceed 24.93 tons per year, CO emissions

Emissions Unit ID: **B004**

shall not exceed 6.28 tons per year, VOC emissions shall not exceed 0.73 tons per year, and SO₂ emissions shall not exceed 4.2 tons per year and PM emissions shall not exceed 0.74 ton per year.

Applicable Compliance Method: Compliance with these annual limitations shall be assumed as long as compliance with the hourly emissions limitations and annual hours of operation limitation is maintained (the annual limitations were calculated by multiplying by 2000, and then dividing by 2000).

- h. Emission Limitation: The quality of the no. 2 fuel oil burned in this emissions unit shall meet a sulfur content which is equal to or less than 0.5 weight percent sulfur on an "as burned" basis.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping requirements pursuant to section C.3 above.

F. Miscellaneous Requirements

None

Shelly Materials Plant 62
 PTI Application: 01-12208
 Issued: To be entered upon final issuance

Facility ID: 0123000206

Emissions Unit ID: B004

SIC CODE SCC CODE EMISSIONS UNIT ID
 EMISSIONS UNIT DESCRIPTION
 DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.53	0.74	0.53	0.74
PM ₁₀					
Sulfur Dioxide	attainment	3.03	4.2	3.03	4.2
Organic Compounds	non attainment	0.53	0.73	0.53	0.73
Nitrogen Oxides	non attainment	18.0	24.93	18.0	24.93
Carbon Monoxide	attainment	4.53	6.28	4.53	6.28
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance w/ the permitted emission limits and applicable rules

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

Shelly Materials Plant 62
PTI Application: 01-12208
Issued: To be entered upon final issuance

Facility ID: 0123000206

Emissions Unit ID: **B004**

SIC CODE SCC CODE EMISSIONS UNIT ID
 EMISSIONS UNIT DESCRIPTION
 DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.53	0.74	0.53	0.74
PM ₁₀					
Sulfur Dioxide	attainment	3.03	4.2	3.03	4.2
Organic Compounds	non attainment	0.53	.73	.53	.73
Nitrogen Oxides		18.0	24.93	18.0	24.93
Carbon Monoxide	attainment	4.53	6.28	4.53	6.28
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination Compliance w/ the permitted emission limits and applicable rules

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____