



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08504

DATE: 12/6/2001

Seifert Construction
John Seifert
8663 Lancaster New Lexington
Bremen, OH 43107

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 12/6/2001
Effective Date: 12/6/2001**

FINAL PERMIT TO INSTALL 01-08504

Application Number: 01-08504
APS Premise Number: 0123000286
Permit Fee: **\$600**
Name of Facility: Seifert Construction
Person to Contact: John Seifert
Address: 8663 Lancaster New Lexington
Bremen, OH 43107

Location of proposed air contaminant source(s) [emissions unit(s)]:
**225 Logan Thornville Rd
Bremen, Ohio**

Description of proposed emissions unit(s):
Cylinders, abrasive blasting unit and spray painting.

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

Director

Part I - GENERAL TERMS AND CONDITIONS

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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

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 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)

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

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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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 Construction

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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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>
PM	11.26
VOC	48.0

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Spray Painting Unit	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions from coatings and clean up materials shall not exceed 16.7 pounds per hour.
		Volatile Organic Compound (VOC) emissions from coatings shall not exceed 38.9 tons per year.
		Volatile Organic Compound (VOC) emissions from cleanup materials shall not exceed 9.1 tons per year.
		3.11 pounds of VOC per gallon of coating, minus water and exempt solvents.
		7.26 pounds of VOC per gallon of cleanup material, minus water and exempt solvents.
	OAC rule 3745-21-09(U)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule

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Seifer

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Issued: 12/6/2001

Emissions Unit ID: **K001**

3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a none

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 25,000 gallons.
2. The maximum annual cleanup material usage for this emissions unit shall not exceed 2,500 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and clean up material employed.
 - b. The number of gallons of each coating and clean up material employed.
 - c. The as applied volatile organic compound content of each coating and clean up material, in pounds per gallon minus water and exempt solvents.
 - d. The total volatile organic compound emission rate for all coatings and clean up materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly volatile organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permit to install for this emissions unit (K001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the TSCREEN. The predicted 1-hour maximum ground-level concentration from the use of the TSCREEN model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Emissions Unit ID: **K001**

Pollutant: Napthalene

TLV (mg/m3): 52

Maximum Hourly Emission Rate (lbs/hr):16.67

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3):536

MAGLC (ug/m3):1238

Pollutant: Xylene

TLV (mg/m3):434

Maximum Hourly Emission Rate (lbs/hr):16.67

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 536

MAGLC (ug/m3):10,333

Pollutant: Benzene

TLV (mg/m3): 1.6

Maximum Hourly Emission Rate (lbs/hr):1.138

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 36.6

MAGLC (ug/m3):38.1

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr):16.67

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3):536

MAGLC (ug/m3):4476

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
 4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. An identification of each day during which the average hourly volatile organic compound emissions from the coatings and cleanup materials exceeded 16.7 pounds per hour, and the actual average hourly volatile organic compound emissions for each such day.
2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing the use of any coating with a VOC content greater than 3.11 pounds of VOC per gallon, minus water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.
3. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing the use of any cleanup material with a VOC content greater than 7.26 pounds of VOC per gallon, minus water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.
4. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emission Limitations: Volatile Organic Compound (VOC) emissions from coatings and clean up materials shall not exceed 16.7 pounds per hour, Volatile Organic Compound (VOC) emissions from coatings shall not exceed 38.9 tons per year and Volatile Organic Compound (VOC) emissions from cleanup materials shall not exceed 9.1 tons per year.

Applicable Compliance Method: Compliance with the VOC emission limits in this permit shall be demonstrated by the recordkeeping requirements in section C of these terms and conditions.

Emission Limitation: Volatile Organic Compound emissions shall not exceed 3.11 pounds of VOC per gallon of coating, excluding water and exempt solvents and 7.26 pounds of VOC per gallon of cleanup material, minus water and exempt solvents.

Applicable Compliance Method: U.S. EPA Method 24 shall be used to determine the VOC

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content for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: Method 24 data may be supplied by the coating manufacturer.

F. Miscellaneous Requirements

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Circular Blast Unit	OAC rule 3745-31-05(A)(3)	Particulate emissions from P001 and P002 shall not exceed 2.57 pounds per hour and 11.26 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). See A.2.a below
	OAC rule 3745-17-07(A)(1)	Visible emissions of particulate from the stack shall not exceed 20% opacity, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 374-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a Particulate emissions from the baghouse controlling particulate emissions from emissions units P001 and P002 shall not exceed 0.02 grains per dry standard cubic foot.

Seifert
PTI A₁

Emissions Unit ID: **P001**

B. Operational Restrictions

1. The pressure drop across the baghouse controlling emissions from emissions unit P001 and P002 shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
2. All abrasive blasting activity performed by this emissions unit shall occur within the total enclosure dedicated to this emissions unit.
3. All doors that are associated with the total enclosure containing this emissions unit shall remain closed while this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. 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 on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operation log. If visible emissions are observed, the permittee shall also note the following in the operation log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operation;
 - c. if the emissions are not representative of normal operation, the cause of the abnormal emissions;
 - d. the total duration of any abnormal visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal emissions.

The permittee may, upon receipt of written approval from the Ohio EPA Central District Office, modify the above-mentioned visible particulate emissions check frequency if operating experience indicates that less frequent checks would be sufficient to ensure compliance with the visible particulate emissions requirements.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports are due by the date described in Part 1- General Terms and Condition of this permit under section (A)(1).
2. The permittee shall submit deviation (excursion) reports to the Central District Office that identify any of the following occurrences:
 - a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. describe any corrective actions taken to eliminate the abnormal visible particulate emissions.

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

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
Particulate emissions from P001 and P002 shall not exceed 2.57 pounds per hour and 0.02 gr/dscf.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but no later than 180 days after initial startup of the emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate matter.
- iii. The following test method(s) shall be employed to demonstrate compliance with

allowable mass emission rate(s): Method 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv The test(s) shall be conducted while emissions units P001 and P002 are operating at or near their maximum capacity unless otherwise specified or approved by the Central District Office.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(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 field office's refusal to accept the results of the emissions test(s).

Personnel from the 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 regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emission test(s) shall be submitted within 30 days following completion of the test(s).

3. Emissions Limitation: Particulate emissions shall not exceed 11.26 tons per year .

Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

4. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity.

Applicable Compliance Method: 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).

F. Miscellaneous Requirements

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Abrasive Blasting Unit	OAC rule 3745-31-05(A)(3)	Particulate emissions from P001 and P002 shall not exceed 2.57 pounds per hour and 11.26 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). See A.2.a below
	OAC rule 3745-17-07(A)(1)	Visible emissions of particulate from the stack shall not exceed 20% opacity, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 374-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a Particulate emissions from the baghouse controlling particulate emissions from emissions units P001 and P002 shall not exceed 0.02 grains per dry standard cubic foot.

Seifert
PTI A₁

Emissions Unit ID: **P002**

B. Operational Restrictions

1. The pressure drop across the baghouse controlling emissions from emissions units P001 and P002 shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
2. All abrasive blasting activity performed by this emissions unit shall occur within the total enclosure dedicated to this emissions unit.
3. All doors that are associated with the total enclosure containing this emissions unit shall remain closed while this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. 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 on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operation log. If visible emissions are observed, the permittee shall also note the following in the operation log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operation;
 - c. if the emissions are not representative of normal operation, the cause of the abnormal emissions;
 - d. the total duration of any abnormal visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal emissions.

The permittee may, upon receipt of written approval from the Ohio EPA Central District Office, modify the above-mentioned visible particulate emissions check frequency if operating experience indicates that less frequent checks would be sufficient to ensure compliance with the visible particulate emissions requirements.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports are due by the date described in Part 1- General Terms and Condition of this permit under section (A)(1).
2. The permittee shall submit deviation (excursion) reports to the Central District Office that identify any of the following occurrences:
 - a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. describe any corrective actions taken to eliminate the abnormal visible particulate emissions.

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

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
Particulate emissions from P001 and P002 shall not exceed 2.57 pounds per hour and 0.02 gr/dscf.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but no later than 180 days after initial startup of the emissions unit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate matter.
- iii. The following test method(s) shall be employed to demonstrate compliance with

Emissions Unit ID: **P002**

allowable mass emission rate(s): Method 5 of 40 CFR Part 60, Appendix A.
Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- iv The test(s) shall be conducted while emissions units P001 and P002 are operating at or near their maximum capacity unless otherwise specified or approved by the Central District Office.
- b. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(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 field office's refusal to accept the results of the emissions test(s).

Personnel from the 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 regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emission test(s) shall be submitted within 30 days following completion of the test(s).

- c. Emissions Limitation: Particulate emissions shall not exceed 11.26 tons per year .
- Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
- d. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity.
- Applicable Compliance Method: 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).

F. Miscellaneous Requirements

None