State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
FRANKLIN COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 01-08116

DATE: 4/26/00

Techneglas Inc
Larry Tock
727 E Jenkins Ave
Columbus, OH 43207

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

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

CC: USEPA **CDO**

FINAL PERMIT TO INSTALL 01-08116

Application Number:	01-08116
APS Premise Number:	0125040296
Permit Fee:	**$1200**
Name of Facility:	Techneglas Inc
Person to Contact:	Larry Tock
Address:	727 E Jenkins Ave Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
727 East Jenkins Avenue
Columbus, Ohio

Description of proposed emissions unit(s):
Pelletizing of residual grinding media.

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. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

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

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition

declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. 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.

6. 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 Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. 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).

9. 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.

10. 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.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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

Pollutant	Tons Per Year
PM	8.5
Lead	0.596

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

A.I. to A.VI.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

B.III.

Part III -
SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements
	OAC rule 3745-17-07(B)(1)
P023 - Residual Grinding Media (RGM) Pelletizer w/pneumatic conveyor, dryer, storage bin and baghouse vented to a HEPA filter.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(A)(1)
	OAC rule 3745-17-08(B)

Applicable Emissions Limitations/Control Measures	
Particulate emission shall not exceed 1.94 pound per hour and 8.5 ton per year. See A.2.a. below.	
Total lead emissions shall not exceed 0.136 pound per hour and 0.596 ton per year. See A.2.b. below.	
There shall be no visible stack emissions (0% opacity, as a six-minute average) from the HEPA filter serving this emissions unit. See A.2.b. below.	
There shall be no visible fugitive particulate matter from any part of the emissions unit or control equipment during drying, screening and conveying of RGM. See A.2.c. below.	
Employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See A.2.c., below.	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The emission limitation specified by this rule is less stringent than the stack opacity emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

2.a The 1.94 pound particulate emission and the 0.136 pound total lead per hour limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

2.b The residual grinding media (RGM) and pelletizer dryers shall be vented to a fabric filter prior to venting with the storage and vibrating screen bin vents to a HEPA filter with an outlet loading of no greater than 0.002 grains per dry standard cubic feet of airflow.

2.c The permittee shall process RGM within a permanent total enclosure during drying, screening and pelletizing sufficient to achieve a 99.98% capture efficiency and eliminate visible fugitive particulate matter.

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the range of 3 to 4 inches of water while the emissions unit is in operation.

2. The pressure drop across the HEPA filtration system shall be maintained within the range of 1 to 3 inches of water while the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter 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).

2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the HEPA filtration system 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).

3. The permittee shall collect and record the following information for each day:

   a. the pressure drop across the fabric filter once per shift, whenever the emissions unit is in operation;

   b. the pressure drop across the HEPA filtration system once per shift, whenever the emissions unit is in operation; and

   c. any time periods when the fabric filters and/or the HEPA filtration system were not in service, when the emissions unit was in operation.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions (excluding uncombined water vapor) from the capture points and stack serving this emissions unit. The presence or absence of any visible particulate emissions shall be recorded electronically or in an operations log. If visible particulate emissions are observed, the permittee shall also record the following:

   a. the color of the emissions;

   b. whether the emissions are representative of normal operations;

   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

   d. the total duration of any visible emission incident; and

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

IV. Reporting Requirements

1. In accordance with paragraph A. 2. b. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports of the following:

   a. all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above,

   b. all periods of time during which the pressure drop across the HEPA filtration system did not comply with the allowable range specified above, and

   c. any time periods when the fabric filters and/or the HEPA filtration system were not in service when the emissions unit was in operation.

   d. identify all days during which any abnormal visible particulate emissions were observed

from the capture points and stack serving this emissions unit and describe any corrective actions taken to eliminate the visible particulate emissions.

V. 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):

a. Emission Limitation -
Particulate emissions shall not exceed 1.94 pound per hour

Applicable Compliance Method -
Compliance shall be determined on once each shift, in accordance with the monitoring and record keeping requirements in Section A.III.1.
9,000 lb residual ground glass(RGM) * (1-0.9998) = 1.8 lb fugitive PE/hr
0.002 gr/dscf * 8,000 acf/min * 60 min/hr * 1 lb/7,000 gr/ft3 = 0.136 lb stack PE /hr

0.136 pound stack emission + 1.8 pound fugitive emission = 1.94 lb PE/hr

b. Emission Limitation -
Particulate emissions shall not exceed 8.5 ton per year

Applicable Compliance Method -
Compliance shall be determined by multiplying the 1.94 pound per hour emission limitation by the maximum potential operating schedule of 8,760 hours per year and dividing by 2,000 pounds per ton.

c. Emission Limitation -
Lead emissions shall not exceed 0.136 pound per hour.

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 6 months following permit issuance.

ii The emission testing shall be conducted to demonstrate compliance with the outlet loading of 0.002 grains per dry standard cubic feet of air flow from the HEPA filter and/or 0.136 lb Pb/hour, which ever is more stringent.

iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):Method 1-4 and 12, 40 CFR Part 60, Appendix A- if applicable. 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 the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Central District Office.

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

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

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

d. Emission Limitation -

Lead emissions shall not exceed 0.596 ton year

Applicable Compliance Method -
Compliance shall be determined by multiplying the 0.136 pound per hour emission limitation by the maximum potential operating schedule of 8,760 hours per year and dividing by 2,000 pounds per ton.

e. Emission limitation-
There shall be no visible fugitive particulate matter from enclosures during drying, screening and conveying of RGM.

Applicable Compliance Method -
Compliance shall be demonstrated by visible emissions monitoring performed in accordance with 40CFR Part 60, Appendix A, Method 22 using the methods and procedures specified in OAC rule 3745-17-03(B)(4).

f. Emission limitation-
There shall be no visible stack emissions (0% opacity, as a six-minute average) from the HEPA filter serving this emissions unit..

Applicable Compliance Method -
Compliance shall be demonstrated by visible emissions monitoring performed in accordance with 40CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P023 - Residual Grinding Media Pelletizer w/pneumatic conveyor, dryer, storage bin and baghouse	OAC rule 3745-31-05	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Emissions Unit ID: P023

NEW SOURCE REVIEW FORM B

PTI Number: 01-08116 Facility ID: 0125040296

FACILITY NAME Techneglas Inc

FACILITY DESCRIPTION Pelletizing of residual grinding media. CITY/TWP Columbus

SIC CODE 3229 SCC CODE 3-05-014-10 EMISSIONS UNIT ID P023

EMISSIONS UNIT DESCRIPTION Residual Grinding Media Pelletizer w/pneumatic conveyor, dryer, storage bin and baghouse

DATE INSTALLED 07/95

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			1.94	8.5
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead	Attainment			0.136	0.596
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 Use of enclosures during drying, conveying and pelletizing of RGM with venting to fabric filter and HEPA filter.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ 25,000.00

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: _____

Emissions Unit ID: P023

NEW SOURCE REVIEW FORM B

PTI Number: 01-08116 Facility ID: 0125040296

FACILITY NAME Techneglas Inc

FACILITY DESCRIPTION Pelletizing of residual grinding media. CITY/TWP Columbus

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

Please provide any additional permit specific notes as you deem necessary:

NEW SOURCE REVIEW DISCUSSION

PTI 01-08116 Residual Grinding Media Pelletizer

A. General Information

Techneglas recovers glass grindings from the wastewater stream for reuse in the glass furnaces. The residual grinding media (RGM) is dried and pneumatically conveyed to a storage silo at a maximum process weight rate of 4,500 lb/hr. Dried RGM is then pelletized, fed into a pin mixer, dried in a rotary drier and pneumatically conveyed to a vibrating screen at a maximum process weight rate of 9,000 lb/hr and loaded into supersacks for storage. All processes are enclosed and vented an existing baghouse and HEPA filter.

B. **Applicable Rules**

OAC rule 3745-31-05 - Techneglas employed best available technology by enclosing the driers, pelletizers, and screens and pneumatically conveying the dried RGM and pellets. The bin vents and baghouses are vented to a HEPA filter. The hourly allowable for particulate matter with an allowable outlet grain loading of 0.02 gr/dcsf at the maximum airflow of 8,000 acfm from the baghouse with an additional 90% reduction across the HEPA filter. This component is also the basis for the hourly allowable limit for lead. The fugitive component assumes a 99.98% capture efficiency of 99.98% will be used to calculate fugitive emissions for the processing of the residual grinding media. Because the allowable limit for lead is less than 0.596 ton per year, modeling is not required to demonstrate compliance with the allowable PSD increment or the Ohio toxic policy.

C. Miscellaneous

The application lists an initial startup date of January 1996,with modification in June 1999.

D. Fee

The fee based on a process weight rate of 9,000 lbs/hr of $600.00 would be doubled to $1,200.

Calculations

Stack emissions (Allowable lead emissions)

8,000 acf/minute * 0.02gr/dscf * 60 minute/hour * 1 lb/7,000 gr * (1-.90) = 0.137 lb PM/hr

0.137 lb PM/hr * 8,760 hrs/yr * 1 ton/2,000 lbs = 0.596 ton PM/yr

Fugitive emissions (Allowable particulate emissions)

9,000 lb RGM * (1- 0.9998 capture efficiency) = 1.8 lb PM/hr + 0.137 lb PM/hr = 1.937 lb PM/hr

1.94 lb PM/hr * 8,760 hrs/yr * 1 ton/2,000 lbs = 8.5 ton/yr

NEW SOURCE REVIEW FORM B

PTI Number: 01-08116 Facility ID: 0125040296

FACILITY NAME Techneglas Inc

FACILITY DESCRIPTION Pelletizing of residual grinding media. CITY/TWP Columbus

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
PM	8.5
Lead	0.596