



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
FRANKLIN 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: 01-08283**

**DATE: 12/12/2002**

Allied Mineral Products Inc  
Jason Krantz  
2700 Scioto Pkwy  
Columbus, OH 43221

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 12/12/2002  
Effective Date: 12/12/2002**

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08283**

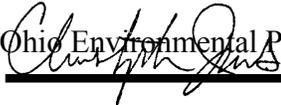
Application Number: 01-08283  
APS Premise Number: 0125040959  
Permit Fee: **\$0**  
Name of Facility: Allied Mineral Products Inc  
Person to Contact: Jason Krantz  
Address: 2700 Scioto Pkwy  
Columbus, OH 43221

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2700 Scioto Pkwy  
Columbus, Ohio**

Description of proposed emissions unit(s):  
**Modification of PTI 01-8283 issued on 6/18/02 to correct terms and conditions and rule citations.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency  


Director

Allied Mineral Products Inc  
PTI Application: 01-08283  
Modification Issued: 12/12/2002

Facility ID: 0125040959

## 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**

- 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

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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.

#### **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	22.2

**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 - 1100 system- one batch hoist, two mixers, two baggers, and one dust collector	OAC rule 3745-31-05(A)(3)	Total particulate emissions from P002 shall not exceed 0.55 pound per hour and 2.43 tons per year.
		See A.2.b below
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-17-07(B)(1) and 3745-17-08(B).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)(1)	See section A.I.2c below
	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust (See section A.I.2.d below)

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**Allied**

**PTI A**

**Modification Issued: 12/12/2002**

Emissions Unit ID: **P002**

**2. Additional Terms and Conditions**

**2.a** The limitations of 0.55 pound particulate emission per hour and 2.43 tons particulate emissions per year were established for PTI purposes to reflect the potential to emit for this emissions unit as vented to a baghouse. Therefore, the parametric monitoring of the baghouse as established in the following terms and conditions will ensure compliance with these limits.

**2.b** Particulate emissions from the baghouse controlling particulate emissions from emissions unit P002 shall not exceed 0.02 grain per dry standard cubic foot.

**2.c** Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.

**2.d** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of RACM. These measures shall include, but not be limited to, the following:

- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
- ii. the collection of efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

**B. Operational Restrictions**

1. The pressure drop across the baghouse controlling emissions from emissions unit P002 shall be maintained within the range of 4 to 10 inches of water while the 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

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**Allied**

**PTI A**

**Modification Issued: 12/12/2002**

Emissions Unit ID: **P002**

drop across the baghouse on a daily basis.

**Modification Issued: 12/12/2002**

2. The permittee shall perform weekly checks for visible emissions from the baghouse 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 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.
  
3. The permittee shall perform weekly checks for visible fugitive emissions from all non-stack egress points. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:
  - 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.

**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. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emission were observed from the baghouse stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive particulate emission were observed from any non-stack egress point and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These

**Allied Mineral Products Inc**  
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**Facility ID: 0125040959**

Emissions Unit ID: **P002**

reports shall be submitted to the Director (the appropriate Ohio EPA District Office of local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

**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 methods:

- a. Emission limitations:

Total particulate emissions from P002 shall not exceed 0.55 pound per hour.

Emission limitations:

Particulate emissions from the baghouse controlling P002 shall not exceed 0.49 pound 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 this emissions units is operating at or near its maximum capacity unless otherwise specified or approved by the Central District Office.

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 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 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

Emissions Unit ID: P002

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).

Emission limitations:

Fugitive particulate emissions from P002 shall not exceed 0.06 pound per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly throughput (ton per hour) by the applicable emission factor (pound per ton) and applicable capture control factor (PTI application, historical data, 08/21/2000) for each process step, then multiplying the sum of emissions from each process step by the building control factor of 95% (PTI application, historical data, 08/21/2000).

- b. Emission limitations: Total particulate emissions shall not exceed 2.43 tons per year.

Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the total hourly limitation (0.55 pound per hour) is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, then dividing by 2000).

- c. Emission limitations: Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule, from the stack.

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).

- d. Emission Limitations: Fugitive emissions from any egress point shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

## 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>
P003 - 1400 System - one batch hoist, one mixer, one conveyer belt, extruder, screw conveyor and bagger, and one dust collector	OAC rule 3745-31-05(A)(3)	Total particulate emissions from P003 shall not exceed 0.51 pound per hour and 2.23 tons per year.
		See A.2.b below
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-17-07(B)(1) and 3745-17-08(B).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)(1)	
	OAC rule 3745-17-08(B)	See section A.I.2c below

**Allied**

**PTI A**

**Modification Issued: 12/12/2002**

Emissions Unit ID: **P003**

Reasonably available control measures (RACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust (See section A.I.2.d below)

**2. Additional Terms and Conditions**

**2.a** The limitations of 0.99 pound particulate emission per hour and 4.33 tons particulate emissions per year were established for PTI purposes to reflect the potential to emit for this emissions unit as vented to a baghouse. Therefore, the parametric monitoring of the baghouse as established in the following terms and conditions will ensure compliance with these limits.

**2.b** Particulate emissions from the baghouse controlling particulate emissions from emissions unit P003 shall not exceed 0.02 grain per dry standard cubic foot.

**2.c** Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.

**2.d** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of RACM. These measures shall include, but not be limited to, the following:

- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
- ii. the collection of efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

**B. Operational Restrictions**

1. The pressure drop across the baghouse controlling emissions from emissions unit P003 shall be maintained within the range of 1 to 8 inches of water while the 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

**Allied Mineral Products Inc**  
**PTI Application: 01 00102**  
**Modif**

**Facility ID: 0125040959**

**Emissions Unit ID: P003**

drop across the baghouse on a daily basis.

**Modification Issued: 12/12/2002**

2. The permittee shall perform weekly checks for visible emissions from the baghouse 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 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.
  
3. The permittee shall perform weekly checks for visible fugitive emissions from all non-stack egress points. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:
  - 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.

**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. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
  
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
  
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive particulate emission were observed from any non-stack egress point and (b)

**Allied**

**PTI A**

**Modification Issued: 12/12/2002**

Emissions Unit ID: **P003**

describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office of local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## 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 methods:

a. Emission limitations:

Total particulate emissions from P003 shall not exceed 0.51 pound per hour.

Emissions limitations:

Particulate emissions from the baghouse controlling P003 shall not exceed 0.44 pound per hour and 0.02 gr/dscf.

Applicable Compliance Method:

If required, 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 this emissions units is operating at or near its maximum capacity unless otherwise specified or approved by the Central District Office.

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 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 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).

Emission limitations:

Fugitive particulate emissions from P003 shall not exceed 0.07 pound per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly throughput (ton per hour) by the applicable emission factor (pound per ton) and applicable capture control factor (PTI application, historical data, 08/21/2000) for each process step, then multiplying the sum of emissions from each process step by the building control factor of 95% (PTI application, historical data, 08/21/2000).

- b. Emission limitations: Total particulate emissions shall not exceed 2.23 tons per year.

Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the total hourly limitation (0.51 pound per hour) is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, then dividing by 2000).

- c. Emission limitations: Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule, from the stack.

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).

- d. Emission Limitations: Fugitive emissions from any egress point shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

## 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>
P005 - 1600 system - one batch hoist, one mixer, screw conveyor and bagger, and one dust collector	OAC rule 3745-31-05(A)(3)	Total particulate emissions from P005 shall not exceed 1.04 pound per hour and 4.55 tons per year.
		See A.2.b below
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(B)(1)	See section A.I.2c below
	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust (See section A.I.2.d below)

**2. Additional Terms and Conditions**

- 2.a The short term limitations of 1.04 pound particulate emission per hour and 4.55 tons particulate emissions per year were established for PTI purposes to reflect the potential to emit for this emissions unit as vented to a baghouse. Therefore, the parametric monitoring of the baghouse as established in the following terms and conditions will ensure compliance with these limits.

Emissions Unit ID: P005

- 2.b** Particulate emissions from the baghouse controlling particulate emissions from emissions unit P005 shall not exceed 0.02 grain per dry standard cubic foot.
- 2.c** Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.

- 2.d** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of RACM. These measures shall include, but not be limited to, the following:
- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
  - ii. the collection of efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

## **B. Operational Restrictions**

1. The pressure drop across the baghouse controlling emissions from emissions unit P005 shall be maintained within the range of 2 to 8 inches of water while the 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 weekly checks, for visible emissions from the baghouse 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 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.
3. The permittee shall perform weekly checks for visible fugitive emissions from all non-stack egress points. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:
    - 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.

#### **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. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive particulate emission were observed from any non-stack egress point and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **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 methods:

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**Modif**

**Facility ID: 0125040959**

Emissions Unit ID: **P005**

- a. Emission limitations:  
Total particulate emissions from P005 shall not exceed 1.04 pounds per hour.  
  
Emission limitations:  
Particulate emissions from the baghouse controlling P005 shall not exceed 0.83 pound per hour and 0.02 gr/dscf.

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Applicable Compliance Method:

If required, 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 this emissions units is operating at or near its maximum capacity unless otherwise specified or approved by the Central District Office.

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 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 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).

Emission limitations:

Fugitive particulate emissions from P005 shall not exceed 0.21 pound per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly throughput (ton per hour) by the applicable emission factor (pound per ton) and applicable capture control factor (PTI

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application, historical data, 08/21/2000) for each process step, then multiplying the sum of emissions from each process step by the building control factor of 95% (PTI application, historical data, 08/21/2000).

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**Modif**

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Emissions Unit ID: **P005**

- b. Emission limitations: Total particulate emissions shall not exceed 4.55 tons per year.

Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the total hourly limitation (1.04 pounds per hour) is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, then dividing by 2000).

- c. Emission limitations: 20% opacity, as a 3-minute average, fugitive emission from any egress point.

Applicable Compliance Method: Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

**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>
P006 - 1200 System - two batch hoists, two mixers, four hoppers, two baggers, and one palletizer, and two dust collectors	OAC rule 3745-31-05(A)(3)	Total particulate emissions from P006 shall not exceed 2.98 pound per hour and 13.0 tons per year.
		See A.2.b below
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-17-07(B)(1) and 3745-17-08(B).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)(1)	
	OAC rule 3745-17-08(B)	See section A.I.2c below

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Reasonably available control measures (RACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust (See section A.I.2.d below)

**2. Additional Terms and Conditions**

**2.a** The limitations of 2.98 pound particulate emission per hour and 13.0 tons particulate emissions per year were established for PTI purposes to reflect the potential to emit for this emissions unit as vented to a baghouse. Therefore, the parametric monitoring of the baghouse as established in the following terms and conditions will ensure compliance with these limits.

**2.b** Particulate emissions from the baghouse controlling particulate emissions from emissions unit P006 shall not exceed 0.02 grain per dry standard cubic foot.

**2.c** Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors.

**2.d** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of RACM. These measures shall include, but not be limited to, the following:

- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
- ii. the collection of efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

**B. Operational Restrictions**

1. The pressure drop across the baghouse controlling emissions from emissions unit P006 shall be maintained within the range of 1 to 8 inches of water while the 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

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**Modif**

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**Emissions Unit ID: P006**

drop across the baghouse on a daily basis.

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2. The permittee shall perform weekly checks for visible emissions from the baghouse 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 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.
  
3. The permittee shall perform weekly checks for visible fugitive emissions from all non-stack egress points. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive emissions are observed, the permittee shall also note the following in the operations log:
  - 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.

**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. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
  
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
  
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive particulate emission were observed from any non-stack egress point and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These

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reports shall be submitted to the Director (the appropriate Ohio EPA District Office of local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

**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 methods:

- a. Emission limitations:

Total particulate emissions from P006 shall not exceed 2.98 pounds per hour.

Emission limitations:

Particulate emissions from the baghouse controlling P006 shall not exceed 2.62 pound 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 this emissions units is operating at or near its maximum capacity unless otherwise specified or approved by the Central District Office.

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 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 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

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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).

Emission limitations:

Fugitive particulate emissions from P006 shall not exceed 0.35 pound per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly throughput (ton per hour) by the applicable emission factor (pound per ton) and applicable capture control factor (PTI application, historical data, 08/21/2000) for each process step, then multiplying the sum of emissions from each process step by the building control factor of 95% (PTI application, historical data, 08/21/2000).

- b. Emission limitations: Total particulate emissions shall not exceed 13.0 tons per year.

Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the total hourly limitation (2.98 pounds per hour) is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, then dividing by 2000).

- c. Emission limitations: Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule, from the stack.

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).

- d. Emission Limitations: Fugitive emissions from any egress point shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

## **F. Miscellaneous Requirements**

None