State of Ohio Environmental Protection Agency

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

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: 01-08783

DATE: 9/11/2003

Allied Mineral Products Inc
William Carmean
2700 Scioto Pkwy
Columbus, OH 43221

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 9/11/2003**
Terms and Conditions	**Effective Date: 9/11/2003**

FINAL PERMIT TO INSTALL 01-08783

Application Number:	01-08783
APS Premise Number:	0125040959
Permit Fee:	**$6000**
Name of Facility:	Allied Mineral Products Inc
Person to Contact:	William Carmean
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):
Mixing and packaging of unformed refractory materials.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

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 Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
PE	11.7

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P021 - Columbia system - one batch hoist, one mixer, one hopper, and one packager all controlled by baghouse no. 22	OAC rule 3745-31-05(A)(3)	Total particulate emissions shall not exceed 1.23 pounds per hour and 5.4 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 A.I.2.c below
	OAC rule 3745-17-08(B)	Best available control measures (BACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust. (See A.I.2.d below)

2. Additional Terms and Conditions

2.a The emission limitations of 1.23 pounds PE per hour and 5.4 tons PE per year are based on the potential to emit vented through the above referenced control equipment. Therefore, only the monitoring, record keeping or reporting requirements of the control equipment and fugitive emissions are necessary to ensure compliance with these emission limitations.

2.b PE from the baghouse controlling this emissions unit 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 BACM. 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 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 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 drop across the baghouse on a daily basis.

2. 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 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.

2. 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 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 shall not exceed 1.23 pounds per hour.

   Applicable Compliance Method:
   Compliance shall be demonstrated by summing the emissions from each part of the process as follows:

   Tote to mixer process emissions shall be determined by summing the fugitive and stack emissions. Stack emissions are determined by multiplying the maximum throughput of 9.0 tons/hr by the emission factor of 1.5 lbs/ton (PTI application, historical data, 08/22/2003) by the amount vented to the baghouse (1-0.05) and the baghouse control efficiency (1-0.98)(PTI application, historical data, 08/22/2003). Fugitive emissions are determined by multiplying the maximum throughput of 9.0 tons/hr by the emission factor of 1.5 lbs/ton by the fugitive amount (1-0.95) and by the building control efficiency (1-0.95)(PTI application, historical data, 08/22/2003).

   Bags to mixer process emissions shall be determined by summing the fugitive and stack emissions. Stack emissions are determined by multiplying the maximum throughput of 3.78 tons/hr by the emission factor of 1.5 lbs/ton (PTI application, historical data,

08/22/2003) by the amount vented to the baghouse (1-0.05) and the baghouse control efficiency (1-0.98)(PTI

application, historical data, 08/22/2003). Fugitive emissions are determined by multiplying the maximum throughput of 3.78 tons/hr by the emission factor of 1.5 lbs/ton by the fugitive amount (1-0.95) and by the building control efficiency (1-0.95)(PTI application, historical data, 08/22/2003).

Mixer to hopper process emissions shall be determined summing the fugitive and stack emissions. Stack emissions are determined by multiplying the maximum throughput of 12.6 tons/hr by the emission factor of 1.5 lbs/ton (PTI application, historical data, 08/22/2003) by the amount vented to the baghouse (1-0.05) and the baghouse control efficiency (1-0.98)(PTI application, historical data, 08/22/2003). Fugitive emissions are determined by multiplying the maximum throughput of 12.6 tons/hr by the emission factor of 1.5 lbs/ton by the fugitive amount (1-0.95) and by the building control efficiency (1-0.95)(PTI application, historical data, 08/22/2003).

Hopper to packager process emissions shall be determined summing the fugitive and stack emissions. Stack emissions are determined by multiplying the maximum throughput of 12.6 tons/hr by the emission factor of 1.5 lbs/ton (PTI application, historical data, 08/22/2003) by the amount vented to the baghouse (1-0.05) and the baghouse control efficiency (1-0.98)(PTI application, historical data, 08/22/2003). Fugitive emissions are determined by multiplying the maximum throughput of 12.6 tons/hr by the emission factor of 1.5 lbs/ton by the fugitive amount (1-0.95) and by the building control efficiency (1-0.95)(PTI application, historical data, 08/22/2003).

b. Emission limitations:
Total particulate emissions shall not exceed 5.4 tons per year.

Applicable Compliance Method:
Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the hourly emission limitation. Emissions are determined by multiplying the maximum short term emission limitation of 1.23 lbs/hr by 8760 hrs/yr and dividing by 2000 lbs/ton.

c. Emission limitations:
PE from the baghouse controlling this emissions unit shall not exceed 0.02 grain per dry standard cubic foot.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 thru 4 and 5. Alternative U.S. EPA- approved test methods may be used with

prior approval from the Ohio EPA.

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

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

Applicable Compliance Method:
If required, 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P022 - Simpson system - one skip hoist, one mixer, one conveyor belt, and one extruder controlled by baghouse no. 22	OAC rule 3745-31-05(A)(3)	Total particulate emissions shall not exceed 0.58 pound per hour and 2.6 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 A.I.2.c below
	OAC rule 3745-17-08(B)	Best available control measures (BACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust. (See A.I.2.d below)

2. Additional Terms and Conditions

2.a The emission limitations of 0.58 pound PE per hour and 2.6 tons PE per year are based on the potential to emit vented through the above referenced control equipment. Therefore, only the monitoring, record keeping or reporting requirements of the control equipment and fugitive emissions are necessary to ensure compliance with these emission limitations.

2.b PE from the baghouse controlling this emissions unit 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 BACM. 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 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 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 drop across the baghouse on a daily basis.

2. 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 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.

2. 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 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 shall not exceed 0.58 pound per hour.

   Applicable Compliance Method:
   Compliance shall be demonstrated by summing the emissions from each part of the process as follows:

   Tote to skip hoist process emissions shall be determined by summing the fugitive and stack emissions. Stack emissions are determined by multiplying the maximum throughput of 5.4 tons/hr by the emission factor of 1.5 lbs/ton (PTI application, historical data,

08/22/2003) by the amount vented to the baghouse (1-0.05) and the baghouse control efficiency (1-0.98)(PTI application, historical data, 08/22/2003). Fugitive emissions are determined by multiplying the maximum throughput of 5.4 tons/hr by the emission factor of 1.5 lbs/ton by the fugitive amount (1-0.95) and by the building control efficiency (1-0.95)(PTI application, historical data, 08/22/2003).

Bags to skip hoist process emissions shall be determined by summing the fugitive and stack emissions. Stack emissions are determined by multiplying the maximum throughput of 3.6 tons/hr by the emission factor of 1.5 lbs/ton (PTI application, historical data, 08/22/2003) by the amount vented to the baghouse (1-0.05) and the baghouse control efficiency (1-0.98)(PTI

application, historical data, 08/22/2003). Fugitive emissions are determined by multiplying the maximum throughput of 3.6 tons/hr by the emission factor of 1.5 lbs/ton by the fugitive amount (1-0.95) and by the building control efficiency (1-0.95)(PTI application, historical data, 08/22/2003).

Skip hoist to mixer process emissions shall be determined summing the fugitive and stack emissions. Stack emissions are determined by multiplying the maximum throughput of 9.0 tons/hr by the emission factor of 1.5 lbs/ton (PTI application, historical data, 08/22/2003) by the amount vented to the baghouse (1-0.05) and the baghouse control efficiency (1-0.98)(PTI application, historical data, 08/22/2003). Fugitive emissions are determined by multiplying the maximum throughput of 9.0 tons/hr by the emission factor of 1.5 lbs/ton by the fugitive amount (1-0.95) and by the building control efficiency (1-0.95)(PTI application, historical data, 08/22/2003).

b. Emission limitations:
Total particulate emissions shall not exceed 2.6 tons per year.

Applicable Compliance Method:
Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the hourly emission limitation. Emissions are determined by multiplying the maximum short term emission limitation of 0.58 lb/hr by 8760 hrs/yr and dividing by 2000 lbs/ton.

c. Emission limitations:
PE from the baghouse controlling this emissions unit shall not exceed 0.02 grain per dry standard cubic foot.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 thru 4 and 5. Alternative U.S. EPA- approved test methods may be used with prior approval from the Ohio EPA.

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

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

Applicable Compliance Method:
If required, 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P023 - Praschak system - one batch hoist, one mixer, and one hopper with screw auger controlled by baghouse no. 22	OAC rule 3745-31-05(A)(3)	Total particulate emissions shall not exceed 0.85 pound per hour and 3.7 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 A.I.2.c below
	OAC rule 3745-17-08(B)	Best available control measures (BACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust. (See A.I.2.d below)

2. Additional Terms and Conditions

2.a The emission limitations of 0.85 pound PE per hour and 3.7 tons PE per year are based on the potential to emit vented through the above referenced control equipment. Therefore, only the monitoring, record keeping or reporting requirements of the control equipment and fugitive emissions are necessary to ensure compliance with these emission limitations.

2.b PE from the baghouse controlling this emissions unit 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 BACM. 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 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 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 drop across the baghouse on a daily basis.

2. 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 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.

2. 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 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 shall not exceed 0.85 pound per hour.

   Applicable Compliance Method:
   Compliance shall be demonstrated by summing the emissions from each part of the process as follows:

   Tote to skip hoist process emissions shall be determined by summing the fugitive and stack emissions. Stack emissions are determined by multiplying the maximum throughput of 9.0 tons/hr by the emission factor of 1.5 lbs/ton (PTI application, historical data,

08/22/2003) by the amount vented to the baghouse (1-0.05) and the baghouse control efficiency (1-0.98)(PTI application, historical data, 08/22/2003). Fugitive emissions are determined by multiplying the maximum throughput of 9.0 tons/hr by the emission factor of 1.5 lbs/ton by the fugitive amount (1-0.95) and by the building control efficiency (1-0.95)(PTI application, historical data, 08/22/2003).

Bags to skip hoist process emissions shall be determined by summing the fugitive and stack emissions. Stack emissions are determined by multiplying the maximum throughput of 8.1 tons/hr by the emission factor of 1.5 lbs/ton (PTI application, historical data, 08/22/2003) by the amount vented to the baghouse (1-0.05) and the baghouse control efficiency (1-0.98)(PTI

application, historical data, 08/22/2003). Fugitive emissions are determined by multiplying the maximum throughput of 8.1 tons/hr by the emission factor of 1.5 lbs/ton by the fugitive amount (1-0.95) and by the building control efficiency (1-0.95)(PTI application, historical data, 08/22/2003).

Skip hoist to mixer process emissions shall be determined summing the fugitive and stack emissions. Stack emissions are determined by multiplying the maximum throughput of 9.0 tons/hr by the emission factor of 1.5 lbs/ton (PTI application, historical data, 08/22/2003) by the amount vented to the baghouse (1-0.05) and the baghouse control efficiency (1-0.98)(PTI application, historical data, 08/22/2003). Fugitive emissions are determined by multiplying the maximum throughput of 9.0 tons/hr by the emission factor of 1.5 lbs/ton by the fugitive amount (1-0.95) and by the building control efficiency (1-0.95)(PTI application, historical data, 08/22/2003).

b. Emission limitations:
Total particulate emissions shall not exceed 3.7 tons per year.

Applicable Compliance Method:
Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the hourly emission limitation. Emissions are determined by multiplying the maximum short term emission limitation of 1.23 lbs/hr by 8760 hrs/yr and dividing by 2000 lbs/ton.

c. Emission limitations:
PE from the baghouse controlling this emissions unit shall not exceed 0.02 grain per dry standard cubic foot.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 thru 4 and 5. Alternative U.S. EPA- approved test methods may be used with prior approval from the Ohio EPA.

d. 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:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures

specified in OAC rule 3745-17-03(B)(1).

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

Applicable Compliance Method:
If required, 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