



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 01-08242

DATE: 10/17/2000

Griffin Wheel Company
Mark Shirley
3900 Bixby Rd
Groveport, OH 43125

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

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

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

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

Very truly yours,

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

CC: USEPA

CDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 01-08242

Application Number: 01-08242
APS Premise Number: 0125100987
Permit Fee: **\$200**
Name of Facility: Griffin Wheel Company
Person to Contact: Mark Shirley
Address: 3900 Bixby Rd
Groveport, OH 43125

Location of proposed air contaminant source(s) [emissions unit(s)]:

3900 Bixby Rd
Groveport, Ohio

Description of proposed emissions unit(s):

Roadways.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. Air Pollution Nuisance

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

5. Termination of Permit To Install

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

6. Construction of New Sources(s)

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

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

7. Public Disclosure

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

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. Best Available Technology

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

10. Construction Compliance Certification

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	12.5

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

A.I. - VI.

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Section A.2.b)</u>	<u>Applicable Rules/Requirements</u>
F005-Paved roadways and employee parking area (see Section A.2.a)		OAC rule 3745-31-05(A)(3)
		OAC rule 3745-17-07(B)(4)
		OAC rule 3745-17-08(B), (B)(8), (B)(9)
Unpaved roadways. (see		OAC rule 3745-31-05(A)(3)

	<p style="text-align: center;"><u>Applicable Emissions Limitations/Control Measures</u></p>	<p>Sections A.2.d., and A.2.e through A.2.i)</p>
	<p>Particulate emissions shall not exceed 12.4 ton per year.</p> <p>There shall be no visible particulate emissions except for a period of one minute during any 60 minute observation period from a paved roadway or parking area.</p>	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.</p>
<p>OAC rule 3745-17-07(B)(5)</p>	<p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.c, and A.2.e through A.2.i)</p>	
<p>OAC rule 3745-17-08(B), (B)(2)</p>	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.</p>	
	<p>Particulate emissions shall not exceed 0.1 ton per year.</p> <p>There shall be no visible particulate emissions except for a period of three minutes during any 60 minute observation period from an unpaved roadway or loading area.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see</p>	

2. Additional Terms and Conditions

- 2.a** The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways:

Entrance roadway
Scrap, limestone and oxygen delivery roadway
Wheel shipment roadway
EAF baghouse access roadway
EAF slag removal staging area

paved parking areas:

Employee parking lot

- 2.b** The unpaved roadway covered by this permit and subject to the above-mentioned requirements is listed below:

unpaved roadways:

Slag haul road to landfill

- 2.c** The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by sweeping at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.d** The permittee shall employ best available control measures on the unpaved roadway for the purpose of ensuring compliance with the

above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas by application of water to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.e** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.f** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.g** The permittee shall promptly remove, in such a manner as to minimize or prevent

Emissions Unit ID: F005
resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

- 2.h Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.i Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- 2.j The use of used oil as a dust suppressant is prohibited per OAC rule 3745-279-82.

II. Operational Restrictions

- 1. A maximum speed limit of 15 miles per hour for vehicular traffic shall be posted and enforced on the paved roadways and parking areas of this facility.
- 2. The permittee shall apply water to unpaved roadways daily, or as needed.
- 3. The permittee shall sweep entrance and exit paved roadways weekly.

III. Monitoring and/or Recordkeeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>Paved roadways and parking areas</u>	<u>Minimum inspection frequency</u>
Entrance roadway and employee parking	Weekly
Scrap, limestone and oxygen delivery roadway	Weekly
Wheel shipment roadway	Weekly
EAF baghouse access roadway	Weekly
EAF slag removal area	Daily

<u>Unpaved roadways and parking areas</u>	<u>Minimum inspection frequency</u>
Slag haul road to landfill	Daily

- 2. The purpose of the inspections is to determine the need for implementing the above-mentioned

control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

3. The permittee may, upon receipt of written approval from the Ohio EPA Central District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways, and shall be updated on a calendar quarter basis.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a.. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

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

a. Emission Limitation-

Particulate emissions from paved roadways shall not exceed 12.4 ton/yr.

Applicable Compliance Method-
 Compliance shall be determined by multiplying the vehicle travel miles per year times a calculated AP-42 emission factor:

Paved roadways AP-42 emission factor
 section 13.2.1

(employee car) $EF = 0.082(9.7/2)^{0.65} (1.5/3)^{1.5} * 56.6 \text{ m/d} * 365 \text{ day/yr} = 4.6 \text{ lb/day}$
 (sand delivery truck) $EF = 0.082(9.7/2)^{0.65} (23.6/3)^{1.5} * 0.06 \text{ m/d} * = 0.3 \text{ lb/day}$
 (lime delivery truck) $EF = 0.082(9.7/2)^{0.65} (28/3)^{1.5} * 0.3 \text{ m/d} = 1.8 \text{ lb/day}$
 (misc delivery truck) $EF = 0.082(9.7/2)^{0.65} (8.3/3)^{1.5} * 0.4 \text{ m/d} = 0.44 \text{ lb/day}$
 (scrap delivery) $EF = 0.082(9.7/2)^{0.65} (29.3/3)^{1.5} * 2.5 \text{ m/d} = 17.5 \text{ lb/day}$
 (finished wheel shipment) $EF = 0.082(9.7/2)^{0.65} (29.3/3)^{1.5} * 5.8 \text{ m/d} = 40.2 \text{ lb/day}$
 (EAF dust truck) $EF = 0.082(9.7/2)^{0.65} (25.7/3)^{1.5} * 0.16 \text{ m/d} = 0.92 \text{ lb/day}$
 (EAF slag truck) $EF = 0.082(9.7/2)^{0.65} (18.4/3)^{1.5} * 2.2 \text{ m/d} = 2.2 \text{ lb/day}$

$67.9 \text{ lb PM/day} * 365 \text{ day/yr} * 1 \text{ ton}/2,000 \text{ lb} = 12.4 \text{ ton PM/yr}$
 Annual emissions = 12.4 ton PM/yr

b. Emission Limitation-

Particulate emissions from unpaved roadways shall not exceed 0.1 ton/yr.

Applicable Compliance Method-
Compliance shall be determined by multiplying the vehicle travel miles per year times a calculated AP-42 emission factor and a control efficiency for dust suppression:

Unpaved roadways AP-42 emission factor section 13.2.2

$$E = (k(1.7)(s/12)(S/30)(W/3)^{0.7}(w/4)^{0.5})^{0.5}$$

(365-p/365)

k = base emission factor for particle size range = 80 (PM-30)

s = surface material silt content = 12% (supplied by permittee)

S = mean vehicle speed, mph = 10

W = average vehicle weight (tons) = 18.4 (EAF slag truck)

w = mean number of wheels = 6

p = number of days with at least 0.01 in of precipitation per year = 140 days/yr

$$E = (0.8) * 5.9 * (6/12) * (10/30) * (18.4/3)^{0.7} * (6/4)^{0.5} (365-140/365) = 2.11 \text{ lb/VMT}$$

Miles traveled = 0.4 miles/day * 365 day/yr (EAF dust truck)

2.11 lb/VMT * 146 miles/yr * 1 ton/2,000

lbs = 0.15 ton PM * (1-0.5) = 0.08 ton

PM/yr

b. Emission limitation-

There shall be no visible emissions except for a period not to exceed one minute during any 60 minute observation period from paved roadways.

Applicable Compliance Method-
Compliance with the emission limitation for the paved roadways and parking areas shall

be determined in accordance with Test Method 22 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)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

c. Emission limitation-

There shall be no visible emissions except for a period not to exceed three-minutes during any 60 minute observation period from unpaved roadways..

Applicable Compliance Method-

Compliance with the emission limitation for the unpaved roadways and parking areas shall be determined in accordance with Test Method 22 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)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F005 - Automobile and truck traffic on paved and unpaved roadways and parking lots	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 01-08242 Facility ID: 0125100987

FACILITY NAME Griffin Wheel Company

FACILITY DESCRIPTION Roadways CITY/TWP Groveport

SIC CODE 3325 SCC CODE 3.-05-025-04 EMISSIONS UNIT ID F005

EMISSIONS UNIT DESCRIPTION Automobile and truck traffic on paved and unpaved roadways and parking lots

DATE INSTALLED 1982

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				12.46
PM ₁₀	Attainment				2.45
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination Use of RACM controls and compliance with rules and regulations

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

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Ohio EPA Permit to Install Information Form

Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

Permit To Install 01-08242

A. Source Description

The Griffin Wheel Groveport plant is located in Franklin County at 3900 Bixby Road and has been in operation since 1986. Existing roadways and parking areas are paved except for a section leading to the slag landfill and metal reclamation area. The original permit application did not include roadways, but because the potential emissions exceed 5 tons per year, roadways are now non-insignificant for Title V permitting.

B. Facility Emissions and Attainment Status

Griffin Wheel reported emitting 101 tons PM in 1999 and is a Title V facility. Franklin County is an attainment area for all criteria pollutants.

C. Source Emissions

The permit application proposes an annual emission rate of 12.4 ton PM/yr for paved and unpaved roadways (F005) based on calculations using AP-42 equations to calculate emission rates. Griffin Wheel employs control measures by posting speed limits, sweeping paved roadways (70%), and application of water to unpaved roadways (50%).

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D. Conclusion

Griffin Wheel is a steel foundry that is not on the list of 28 facilities subject to PSD review. The facility reported 101 tons PM emissions in 1999. The proposed annual PM10 emissions from roadways is 2.45 tons PM10 below the 15 tons PM10 per year for modeling under PSD.

F002 - Paved roadways AP-42 emission factor section 13.2.1

$$EF = k(sL/2)^{0.65} (W/3)^{1.5} \text{ lbs/VMT}$$

k = particle size multiplier = 0.082 lb/VMT (PM-30 Table 13.2.1-1 AP-42)

k = particle size multiplier = 0.016 lb/VMT (PM-10 Table 13.2.1-1 AP-42)

sL = silt loading on road surface = 9.7 gr/ft² (Griffin Wheel)

W = vehicle weight (tons) = 1.5 (employee car)

W = vehicle weight (tons) = 23.6 (sand delivery truck)

W = vehicle weight (tons) = 28 (lime delivery truck)

W = vehicle weight (tons) = 8.3 (misc delivery truck)

W = vehicle weight (tons) = 29.3 (scrap delivery)

W = vehicle weight (tons) = 29.3 (finished wheel shipment)

W = vehicle weight (tons) = 25.7 (EAF dust truck)

W = vehicle weight (tons) = 18.4 (EAF slag truck)

(employee car) EF = 0.082(9.7/2)^{0.65} (1.5/3)^{1.5} = 0.08 lb/VMT * 56.6 m/d * 365 day/yr = 4.6 lb/day(sand delivery truck) EF = 0.082(9.7/2)^{0.65} (23.6/3)^{1.5} = 5.05 lb/VMT * 0.06 m/d * = 0.3 lb/day(lime delivery truck) EF = 0.082(9.7/2)^{0.65} (28/3)^{1.5} = 6.53 lb/VMT * 0.3 m/d = 1.8 lb/day(misc delivery truck) EF = 0.082(9.7/2)^{0.65} (8.3/3)^{1.5} = 1.05 lb/VMT * 0.4 m/d = 0.44 lb/day(scrap delivery) EF = 0.082(9.7/2)^{0.65} (29.3/3)^{1.5} = 7.0 lb/VMT * 2.5 m/d = 17.5 lb/day(finished wheel shipment) EF = 0.082(9.7/2)^{0.65} (29.3/3)^{1.5} = 7.0 lb/VMT * 5.8 m/d = 40.2 lb/day(EAF dust truck) EF = 0.082(9.7/2)^{0.65} (25.7/3)^{1.5} = 5.74 lb/VMT * 0.16 m/d = 0.92 lb/day(EAF slag truck) EF = 0.082(9.7/2)^{0.65} (18.4/3)^{1.5} = 3.5 lb/VMT * 2.2 m/d = 2.2 lb/day

67.9 lb PM/day * 365 day/yr * 1 ton/2,000 lb = 12.4 ton PM/yr

Controlled emissions = 12.4 ton PM * (1 - 0.7 for sweeping) = 3.7 ton PM/yr

Unpaved roadways AP-42 emission factor section 13.2.2

$$E = (k(1.7)(s/12)(S/30)(W/3)^{0.7}(w/4)^{0.5} (365-p/365))$$

k = base emission factor for particle size range = 80 (PM-30)

s = surface material silt content = 12% (supplied by permittee)

S = mean vehicle speed, mph = 10

W = average vehicle weight (tons) = 18.4 (EAF slag truck)

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w = mean number of wheels = 6

p = number of days with at least 0.01 in of precipitation per year = 140 days/yr

 $E = (0.8) * 5.9 * (6/12) * (10/30) * (18.4/3)^{0.7} * (6/4)^{0.5} (365-140/365) = 2.11 \text{ lb/VMT}$

Miles traveled = 0.4 miles/day * 365 day/yr (EAF dust truck)

 $2.11 \text{ lb/VMT} * 146 \text{ miles/yr} * 1 \text{ ton}/2,000 \text{ lbs} = 0.15 \text{ ton PM} * (1-0.5) = 0.08 \text{ ton PM/yr}$ Total PM emissions from paved and unpaved roadways F005 = 12.5 ton PM/yr**PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:**

NONE

Please complete:

SUMMARY (for informational purposes only)	
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS	
<u>Pollutant</u>	<u>Tons Per Year</u>
PM	12.5