

Facility ID: 0243081214 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit P003](#)  
[Go to Part II for Emissions Unit P004](#)

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Facility ID: 0243081214 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
robotic blast booth number 0056 (Vacu-Blast DF-T2) using aluminum oxide blasting media, controlled by a baghouse	OAC rule 3745-31-05(A)(3) (PTI 02-17327)	0.551 lb of particulate emissions per hour and 2.41 tons of particulate emissions per year
	OAC rule 3745-17-11(B)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-17-07(A)	The particulate emission limitation established in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3). The visible emission limitation specified in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- (a) All particulate emissions generated by this emissions unit shall be captured and vented to the associated baghouse and the baghouse shall be in operation at all times while the emissions unit is in operation. The annual emission limitation specified above represents the potential to emit for this emissions unit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.

**B. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within a range of 0.5 to 8 inches of water column at all times while the emissions unit is in operation.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse when the emissions unit is in operation. The pressure drop monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the baghouse on a weekly basis. The units for pressure drop shall be inches of water column.
2. The permit to install for emissions units P003 and P004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Aluminum Oxide  
 TLV (mg/m3): 10  
 Maximum Hourly Emission Rate (lbs/hr): 0.551 (each unit)  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 122.72 (combined)  
 MAGLC (ug/m3): 283

Physical changes to or changes in the method of operation of the emissions unit after its installation or

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

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit written deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the required range specified in section A.II. of these terms and conditions, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.I. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
0.551 lb of particulate emissions per hour and 2.41 tons per year

**Applicable Compliance Method:**

Compliance with the above particulate emission limitation shall be determined using the emission factor (0.69 lb/1,000 lbs of abrasive) from AP-42 "Compilation of Air Pollutant Emission Factors," Table 13.2.6-1 (9/97). The annual emission limitation (2.41 TPY) was determined by multiplying the hourly emission limitation (0.551 lb/hr) by 8,760 hours and dividing by 2,000 lbs/ton.

**Emission Limitation:**

Visible particulate emissions from the stack serving this emissions unit shall not exceed 0% opacity, as a six-minute average.

**Applicable Compliance Method:**

If required, compliance with the above visible emission limitation shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

**F. Miscellaneous Requirements**

1. None

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**Facility ID: 0243081214 Emissions Unit ID: P004 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
automated blast booth number 0059 (2DF40D) using aluminum oxide blasting media, controlled by a baghouse	OAC rule 3745-31-05(A)(3) (PTI 02-17327)	0.551 lb of particulate emissions per hour and 2.41 tons of particulate emissions per year
	OAC rule 3745-17-11(B)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-17-07(A)	The particulate emission limitation established in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3). The visible emission limitation specified in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- (a) All particulate emissions generated by this emissions unit shall be captured and vented to the associated baghouse and the baghouse shall be in operation at all times while the emissions unit is in operation. The annual emission limitation specified above represents the potential to emit for this emissions unit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.

**B. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within a range of 0.5 to 8 inches of water column at all times while the emissions unit is in operation.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse when the emissions unit is in operation. The pressure drop monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the pressure drop across the baghouse on a weekly basis. The units for pressure drop shall be inches of water column.
2. The permit to install for emissions units P003 and P004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Aluminum Oxide  
 TLV (mg/m3): 10  
 Maximum Hourly Emission Rate (lbs/hr): 0.551 (each unit)  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 122.72 (combined)  
 MAGLC (ug/m3): 283

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

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit written deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the required range specified in section A.II. of these terms and conditions, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:  
0.551 lb of particulate emissions per hour and 2.41 tons per year

Applicable Compliance Method:

Compliance with the above particulate emission limitation shall be determined using the emission factor (0.69 lb/1,000 lbs of abrasive) from AP-42 "Compilation of Air Pollutant Emission Factors," Table 13.2.6-1 (9/97). The annual emission limitation (2.41 TPY) was determined by multiplying the hourly emission limitation (0.551 lb/hr) by 8,760 hours and dividing by 2,000 lbs/ton.

Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

**F. Miscellaneous Requirements**

1. None