



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

12/6/2010

Certified Mail

Mr. Timothy DeClerck
Morton Salt, Inc.
151 S. Industrial St.
Rittman, OH 44270

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0285020059
Permit Number: P0106972
Permit Type: OAC Chapter 3745-31 Modification
County: Wayne

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NEDO; Canada



Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	0285020059
Facility Name:	Morton Salt, Inc.
Facility Description:	Processing of Raw Salt
Facility Address:	151 S. Industrial St. Rittman, OH 44270 Wayne County
Permit #:	P0106972, OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Daily Recorder on 11/04/2010. The comment period ended on 12/04/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **Installation of an optional bag leak detection system**
 - a. Comment: **The facility requested the ability to install and operate a bag leak detection system as allowed by 40 CFR 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants as an alternative to quarterly 30-minute visible emissions inspections on the cartridge filter exhaust.**
 - b. Response: **Ohio EPA agrees and the option has been included in the monitoring, record keeping and reporting sections of the permit.**

Ohio

**Environmental
Protection Agency**

FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Morton Salt, Inc.**

Facility ID: 0285020059
Permit Number: P0106972
Permit Type: OAC Chapter 3745-31 Modification
Issued: 12/6/2010
Effective: 12/6/2010



Division of Air Pollution Control
Permit-to-Install
for
Morton Salt, Inc.

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Authorization

Facility ID: 0285020059
Facility Description: Processing of Raw salt
Application Number(s): A0040340
Permit Number: P0106972
Permit Description: Addition of scalping screen subject to NSPS OOO and the inclusion of bagging station
formerly identified as P036.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$750.00
Issue Date: 12/6/2010
Effective Date: 12/6/2010

This document constitutes issuance to:

Morton Salt, Inc.
151 S. Industrial St.
Rittman, OH 44270

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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



Chris Korleski
Director



Authorization (continued)

Permit Number: P0106972
Permit Description: Addition of scalping screen subject to NSPS OOO and the inclusion of bagging station formerly identified as P036.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P029
Company Equipment ID:	Entoleter Pulverizer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.

- 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, 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 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.

4. Monitoring and Related Record Keeping 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:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

- (2) 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 Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, 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.
 - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office 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).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) 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.
- c) 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:



- (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. **Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. **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.

9. **Reporting 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 Ohio EPA DAPC, Northeast District Office.

- 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 Ohio EPA DAPC, Northeast District Office. 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 (i.e., postmarked) quarterly, 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. 40 CFR Part 60, Subpart OOO
 - a) Reporting Requirements
 - (1) In accordance with Section 60.676(a), the permittee shall submit the following information when existing pieces of equipment are replaced:
 - a. for a crusher, grinding mill, bucket elevator, bagging operation or enclosed truck or railcar loading station, the rated capacity in tons per hour of the existing facility being replaced and the rated capacity in tons per hour of the replacement equipment;
 - b. for a screening operation, the total surface area of the top screen of the existing screening operation being replaced and the total surface area of the top screen of the replacement screening operation; or
 - c. for a conveyor belt, the width of the existing belt being replaced and the width of the replacement conveyor belt; or
 - d. for a storage bin, the rated capacity in tons of the existing storage bin being replaced and the rated capacity in tons of replacement storage bins.
 - (2) In accordance with Section 60.6766(i), the permittee shall submit a notification to the Director of the actual date of initial startup of each affected facility. For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the owner or operator to the Director. The notification shall be postmarked with 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.
 - b) Applicability of Subpart A to Subpart OOO. The facilities are subject to the requirements of 40 CFR Part 60, Subpart A, except as clarified in Table 1 of 40 CFR Part 60, Subpart OOO.

C. Emissions Unit Terms and Conditions



1. P029, Entoleter Pulverizer

Operations, Property and/or Equipment Description:

Entoleter Pulverizer including screw conveyors, bins, hoppers, scalping screens, pulverizer and bagging station. Bagging station formerly P036.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	See b)(2)a, b)(2)b, and b)(2)d.
b.	OAC paragraph 3745-31-05(A)(3), as effective 12/30/06	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions emitted by this emissions unit since the potential to emit after controls for PM10 is less than 10 tons/year. See b)(2)e.
c.	OAC rule 3745-17-07(A)(1)	Except as provided by rule, visible particulate emissions (PE) shall not exceed 20 % opacity, as a six-minute average. See b)(2)f.
d.	OAC rule 3745-17-08(B)	None. This facility is not located in an Appendix A area; therefore, per OAC rule 3745-17-08(A)(1), OAC rule 3745-08(B) is not applicable to this emissions unit.
e.	OAC rule 3745-17-07(B)	None, pursuant to OAC rule 3745-17-07(B)(11)(d).
e.	OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and 40 CFR Part 60, Subpart OOO.
f.	40 CFR Part 60, Subpart OOO	Particulate matter emissions shall not exceed 0.014 gr/dscf from the control device egress.



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 2: (blank), Also see the requirements in B.2.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 31, 2001, in this permit. On December 1, 2006, paragraph (A)(3) OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
b. Visible PE from the control device egress shall not exceed 0 % opacity, as a six-minute average.
c. The emissions from this emissions unit shall be vented to a cartridge filter control device at all times the emissions unit is in operation. The cartridge filter control device shall be operated with a sufficient volumetric flow rate to minimize or eliminate visible particulate emissions at the points of capture to the extent possible with good engineering design.
d. Particulate emissions shall not exceed 0.30 lb/hr and 1.32 tons per year from the control device egress.
e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
f. The PE requirements established by this rule are less stringent than the requirements established under OAC rule 3745-31-05(A)(3)(a). On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by US EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the US EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once US EPA approves the December 1, 2006 version of 3745-31-05, then the requirements of OAC rule 3745-17-07(A) and all associated terms and conditions become effective.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22. The 30-minute visible emissions inspection shall be conducted while the cartridge filter control device is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the permittee shall initiate corrective action within 24 hours to return the cartridge filter control device to normal operation. The permittee shall record each 30-minute visible emissions inspection, including the date and any corrective actions taken, in the required logbook. The logbook shall be kept onsite and made available in an electronic or hard copy format to the Director or representative upon request.

If the permittee chooses to comply with the control device monitoring requirements in 40 CFR 60, Subpart OOO by the use of a bag leak detection system on the cartridge filter exhaust, then d)(1) is no longer required.

- (2) The acceptable range for the pressure drop across the cartridge filter control device shall be based upon the manufacturer's specifications, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.

The permittee shall monitor and record each periodic inspection in a logbook (in written or electronic format) the following information:

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the cartridge filter control device when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the cartridge filter control device on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.
- (4) Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

- (5) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:
- a. a description of the corrective action;
 - b. the date corrective action was completed;
 - c. the date and time the deviation ended;
 - d. the total period of time (in minutes) during which there was a deviation;
 - e. the pressure drop readings immediately after the corrective action was implemented; and
 - f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (6) This range or limit on the pressure drop across the cartridge filter control device is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative permit modification.
- (7) As an alternative to the periodic visible emissions inspections specified in d)(1), the permittee may use a bag leak detection system. If installed, the permittee must install, operate and maintain the bag leak detection system according to 40 CFR 60, 674(d)(1).
- (8) If a bag leak detection system is installed, the permittee shall develop and submit to the Ohio EPA District Office for approval of a site-specific monitoring plan for each bag leak detection system that includes the items in 40 CFR 60.674(d)(2). The permittee must operate and maintain the bag leak detection system according to the site specific monitoring plan at all times.
- a. If a bag leak detection system is installed, the permittee shall initial procedures to determine the cause of every bag leak detection system alarm within 1 hour of the alarm. Except as provided by 40 CFR 60.674(d)(2)(vi), the permittee shall alleviate the cause of the alarm within 3 hours of the alarm by taking whatever corrective action(s) are necessary. Corrective actions may include, but are not limited to the following: inspecting the control device for air leaks, torn or broken

- bags or filter media, or any other conditions that may cause an increase in PM emission;
- b. Sealing off defective bags or filter media;
 - c. Replacing defective bags or filter media;
 - d. Sealing off a defective fabric filter or filter media compartment;
 - e. Cleaning the bag leak detection system probe or otherwise repairing the bag leak detection system; or
 - f. Shutting down the process producing the PM emissions
- (9) If a bag leak detection system is installed, the permittee shall keep the records specified below in the required logbook. The logbook shall be kept onsite and made available in an electronic or hard copy format to the Director or representative upon request. The records shall include:
- a. Records of the bag leak detection system output;
 - b. Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings; and
 - c. The date and time of all bag leak detection system alarms, the time that the procedures to determine the cause of the alarm were initiated, the cause of the alarm, an explanation of the actions taken, the date and time the cause of the alarm was alleviated, and whether the cause of the alarm was alleviated within 3 hours of the alarm.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the cartridge filter control device was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the cartridge filter control device;
 - c. each incident of deviation described in a. (above) where a prompt investigation was not conducted;

- d. each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
- e. each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- f. each incident when visible emissions were observed during the quarterly visible emissions inspection and the associated corrective action.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

If the permittee chooses to comply with the control device monitoring requirements in 40 CFR 60, Subpart OOO by the use of a bag leak detection system on the cartridge filter exhaust, then e)(2)f is no longer required.

- (3) If a bag leak detection system is installed, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. the date and time of all bag leak detection system alarms;
 - b. the cause, if known, and the corrective action taken to remedy the alarm; and
 - c. the duration of the alarm event.

f) Testing Requirements

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

Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined according to the requirements of 40 CFR Part 60, Appendix A, Method 9, if requested.
 - b. Emission Limitation:

PE shall not exceed 0.014 gr/dscf from the control device egress.

Applicable Compliance Method:

Compliance with the short term emission limitations shall be determined through stack testing performed according to the requirements of f)(2) through f)(5).

c. Emission Limitation:

PE shall not exceed 0.30 lb/hr from the dry collector egress.

Applicable Compliance Method:

Compliance with the short term emission limitations shall be determined through stack testing performed according to the requirements of f)(2) through f)(5).

d. Emission Limitation:

PE shall not exceed 1.32 tons per year from the dry collector egress.

Applicable Compliance Method:

Compliance with the long term emissions limitation shall be determined using the following equation:

$$E = (\text{Operating gr/dscf})(60 \text{ min/hr})(\text{Operating hrs/yr})(\text{lb}/7000 \text{ gr})(\text{ton}/2000 \text{ lb})(2,500 \text{ dscfm})$$

where:

E= the particulate emissions from the dry collector egress, in tons per year;

Operating gr/dscf = 0.014 gr/dscf, or the grain loading determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate;

Operating hrs/yr = 8760 hrs/yr, or the actual hours of operation and

2,500 dscfm = maximum air flow from the dry collector.

e. Emission Limitation:

PE emissions shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined according to the requirements of 40 CFR Part 60, Appendix A, Method 9, if requested.

- (2) The facility shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 60 days of the complete modification of this emissions unit.
 - b. The emissions testing shall be conducted to demonstrate compliance with the applicable emissions limitation of 0.014 grain per dry standard cubic foot of exhaust.

- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and Method 5 of 40 CFR Part 60, Appendix A and the modifications required by 40 CFR Part 60 Subpart OOO, Sections 60.675. Alternative U.S. EPA approved test methods may be used with prior written approval from the appropriate Ohio EPA District Office or local air agency.
 - d. The test(s) shall be conducted under maximum production rates unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- (3) Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the appropriate Ohio EPA District Office or local air agency's refusal to accept the results of the emission tests.
 - (4) Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - (5) A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- g) **Miscellaneous Requirements**
 - (1) None.