



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-14996

DATE: 6/28/2001

Seaforth Mineral and Ore Co
Terry Milhoan
1st and Market Streets
East Liverpool, OH 43920

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, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 6/28/2001
Effective Date: 6/28/2001**

FINAL PERMIT TO INSTALL 02-14996

Application Number: 02-14996
APS Premise Number: 0215020220
Permit Fee: **\$9600**
Name of Facility: Seaforth Mineral and Ore Co
Person to Contact: Terry Milhoan
Address: 1st and Market Streets
East Liverpool, OH 43920

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

**1st and Market Streets
East Liverpool, Ohio**

Description of proposed emissions unit(s):

4 driers and 2 bagging machines.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

Seaforth Mineral and Ore Co
 PTI Application: 02-14996
 Issued: 6/28/2001

Facility ID: 0215020220

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	23.94 TPY
NOx	7.4 TPY
CO	6.4 TPY

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
Rotary dryer 1, feed hopper, screen and associated bins and bulk tank with a baghouse	Direct fired fuel burning equipment OAC rule 3745-31-05(A)(3)
	 OAC rule 3745-17-07(B)
	 OAC rule 3745-17-08(B)
	 OAC rule 3745-17-11

	<u>Applicable Emissions Limitations/Control Measures</u>	
OAC rule 3745-31-05 (A)(3)	<p>PE: 0.02 grain per dry standard cubic foot of exhaust gases, 1.4 pound per hour, and 6.1 tons per year</p> <p>Visible particulate emissions from the stack shall not exceed five-percent opacity, as a six-minute average.</p>	<p>ton per year (from natural gas combustion)</p> <p>NOx: 0.51 pound per hour and 2.2 tons per year (from natural gas combustion)</p> <p>CO: 0.43 pound per hour and 1.9 tons per year (from natural gas combustion)</p>
OAC rule 3745-17-11	<p>Visible fugitive particulate emissions shall not exceed five-percent opacity, as a three-minute average.</p>	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
OAC rule 3745-21-08	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>	<p>The requirements established pursuant to this rule are equivalent to the requirements of OAC 3745-31-05(A)(3)</p>
OAC rule 3745-23-06	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>	<p>The requirements established pursuant to this rule are equivalent to the requirements of OAC 3745-31-05(A)(3) .</p>
	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>	<p>PE: 0.04 pound per hour and 0.18</p>

2. Additional Terms and Conditions

- 2.a The collection efficiency of the baghouse control system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
2. The permittee shall regularly maintain the baghouse control equipment associated with this emissions unit in accordance with the manufacturer's recommendations. Maintenance shall include regular repair and or replacement of filters/bags so as to maximize the particulate collection efficiency of the control system.
3. Enclosures shall be located at those points necessary to ensure compliance with the visible emission limitations specified in this permit for screening, conveying, and transfer.
4. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis and record the number of days following a media change that are required to meet the minimum pressure drop.
2. The permittee shall maintain daily records of the type and amount of material processed through this emissions unit.
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) and any fugitive egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;

Emissions Unit ID: P001

- b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviations (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) and/or any fugitive egress points serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northeast District Office of the Ohio EPA) and shall cover the previous 6-month period.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall submit opacity deviation (excursion) reports that identify all periods of time during which the emissions unit did not comply with the opacity limits specified above. These reports shall include the average opacity observed, in three or six-minute blocks, the process weight rate during the observation period and the type of material being processed.
5. The deviation (excursion) reports shall be submitted in accordance with reporting requirements of the General Terms and Conditions of this permit.
6. The permittee shall submit deviation (excursion) 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.

E. Testing Requirements

1. Emissions Limitations:
PE: 1.4 pound per hour and 0.02 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the particulate emission rates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03.

2. Emissions Limitation:
PE: 6.1 tons per year

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (1.4 lb/hr) multiplied by the maximum possible operating hours (8760 hr/yr), and divided by 2000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

3. Emissions Limitation:
Five-percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance with the allowable visible stack emissions limitations shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03.

4. Emissions Limitation:
Five-percent opacity, as a three-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the Rotary dryer , feed hopper, screen and associated bins and bulk tank operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

5. Emissions Limitation:
PE: 0.04 pound per hour

Emissions Unit ID: P001

Applicable Compliance Method:

To determine the actual particulate emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

6. Emissions Limitation:
PE: 0.18 ton per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

7. Emissions Limitation:
NOx: 0.51 pound per hour

Applicable Compliance Method:

To determine the actual NOx emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

8. Emissions Limitation:
NOx: 2.2 tons per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

9. Emissions Limitation:
CO: 0.43 pound per hour

Applicable Compliance Method:

To determine the actual CO emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

10. Emissions Limitation:
CO: 1.9 tons per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

11. The permittee 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 6 months following issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northeast District Office.
- d. The test(s) shall be conducted while the emissions unit is operating at maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northeast District Office 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office 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 Ohio EPA, Northeast District Office.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
Rotary dryer 2, feed hopper, screen, and associated bins with a baghouse	OAC rule 3745-31-05(A)(3)
Direct fired fuel burning equipment	OAC rule 3745-17-07(B)
	OAC rule 3745-17-08(B)
	OAC rule 3745-17-11

Emissions Unit ID: P002

Applicable Emissions
Limitations/Control Measures

OAC rule 3745-31-05 (A)(3)

PE: 0.02 grain per dry standard cubic foot of exhaust gases, 1.4 pounds per hour, and 6.1 tons per year

NOx: 0.34 pound per hour and 1.5 tons per year (from natural gas combustion)

CO: 0.29 pound per hour and 1.3 tons per year (from natural gas combustion)

Visible particulate emissions from the stack shall not exceed five-percent opacity, as a six-minute average.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible fugitive particulate emissions shall not exceed five-percent opacity, as a three-minute average.

The requirements established pursuant to this rule are equivalent to the requirements of OAC 3745-21-08.

OAC rule 3745-17-11

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The requirements established pursuant to this rule are equivalent to the requirements of OAC 3745-23-06.

OAC rule 3745-21-08

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-23-06

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

PE: 0.03 pound per hour and 0.13 ton per year (from natural gas combustion)

2. Additional Terms and Conditions

- 2.a The collection efficiency of the baghouse control system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
2. The permittee shall regularly maintain the baghouse control equipment associated with this emissions unit in accordance with the manufacturer's recommendations. Maintenance shall include regular repair and or replacement of filters/bags so as to maximize the particulate collection efficiency of the control system.
3. Enclosures shall be located at those points necessary to ensure compliance with the visible emission limitations specified in this permit for screening, conveying, and transfer.
4. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis and record the number of days following a media change that are required to meet the minimum pressure drop.
2. The permittee shall maintain daily records of the type and amount of material processed through this emissions unit.
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) and any fugitive egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;

- b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviations (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) and/or any fugitive egress points serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northeast District Office of the Ohio EPA) and shall cover the previous 6-month period.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall submit opacity deviation (excursion) reports that identify all periods of time during which the emissions unit did not comply with the opacity limits specified above. These reports shall include the average opacity observed, in three or six-minute blocks, the process weight rate during the observation period and the type of material being processed.
5. The deviation (excursion) reports shall be submitted in accordance with reporting requirements of the General Terms and Conditions of this permit.
6. The permittee shall submit deviation (excursion) reports that identify any of the following occurrences:

Emissions Unit ID: P002

- 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.

E. Testing Requirements

1. Emissions Limitations:

PE: 1.4 pounds per hour and 0.02 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the particulate emission rates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03.

2. Emissions Limitation:

PE: 6.1 tons per year

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (1.4 lb/hr) multiplied by the maximum possible operating hours (8760 hr/yr), and divided by 2000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

3. Emissions Limitation:

Five-percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance with the allowable visible stack emissions limitations shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03.

4. Emissions Limitation:

Five-percent opacity, as a three-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the Rotary dryer, feed hopper, screen, and associated bins operation(s) identified above shall be determined in accordance with Test Method

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

5. Emissions Limitation:
PE: 0.03 pound per hour

Applicable Compliance Method:

To determine the actual particulate emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

6. Emissions Limitation:
PE: 0.13 ton per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

7. Emissions Limitation:
NOx: 0.34 pound per hour

Applicable Compliance Method:

To determine the actual NOx emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

8. Emissions Limitation:
NOx: 1.5 tons per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

9. Emissions Limitation:
CO: 0.29 pound per hour

Applicable Compliance Method:

To determine the actual CO emission rate for natural gas combustion, emission factors outlined in

AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

10. Emissions Limitation:
CO: 1.3 tons per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

11. The permittee 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 6 months following issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northeast District Office.
 - d. The test(s) shall be conducted while the emissions unit is operating at maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northeast District Office 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by

the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office 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 Ohio EPA, Northeast District Office.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
Rotary dryer 3, feed hopper, screen, and associated bins with a baghouse	OAC rule 3745-31-05(A)(3)
Direct fired fuel burning equipment	OAC rule 3745-17-07(B)
	OAC rule 3745-17-08(B)
	OAC rule 3745-17-11

Emissions Unit ID: P003

Applicable Emissions
Limitations/Control Measures

OAC rule 3745-31-05 (A)(3)

PE: 0.02 grain per dry standard cubic foot of exhaust gases, 0.94 pound per hour, and 4.1 tons per year

NOx: 0.34 pound per hour and 1.5 tons per year (from natural gas combustion)

CO: 0.29 pound per hour and 1.3 tons per year (from natural gas combustion)

Visible particulate emissions from the stack shall not exceed five-percent opacity, as a six-minute average.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible fugitive particulate emissions shall not exceed five-percent opacity, as a three-minute average.

The requirements established pursuant to this rule are equivalent to the requirements of OAC 3745-21-08.

OAC rule 3745-17-11

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The requirements established pursuant to this rule are equivalent to the requirements of OAC 3745-23-06.

OAC rule 3745-21-08

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-23-06

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

PE: 0.03 pound per hour and 0.13 ton per year (from natural gas combustion)

2. Additional Terms and Conditions

- 2.a The collection efficiency of the baghouse control system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
2. The permittee shall regularly maintain the baghouse control equipment associated with this emissions unit in accordance with the manufacturer's recommendations. Maintenance shall include regular repair and or replacement of filters/bags so as to maximize the particulate collection efficiency of the control system.
3. Enclosures shall be located at those points necessary to ensure compliance with the visible emission limitations specified in this permit for screening, conveying, and transfer.
4. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis and record the number of days following a media change that are required to meet the minimum pressure drop.
2. The permittee shall maintain daily records of the type and amount of material processed through this emissions unit.
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) and any fugitive egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;

- b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviations (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) and/or any fugitive egress points serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northeast District Office of the Ohio EPA) and shall cover the previous 6-month period.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall submit opacity deviation (excursion) reports that identify all periods of time during which the emissions unit did not comply with the opacity limits specified above. These reports shall include the average opacity observed, in three or six-minute blocks, the process weight rate during the observation period and the type of material being processed.
5. The deviation (excursion) reports shall be submitted in accordance with reporting requirements of the General Terms and Conditions of this permit.
6. The permittee shall submit deviation (excursion) reports that identify any of the following occurrences:

Emissions Unit ID: P003

- 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.

E. Testing Requirements

1. Emissions Limitations:
PE: 0.94 pound per hour and 0.02 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the particulate emission rates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03.

2. Emissions Limitation:
PE: 4.1 tons per year

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (0.94 lb/hr) multiplied by the maximum possible operating hours (8760 hr/yr), and divided by 2000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

3. Emissions Limitation:
Five-percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance with the allowable visible stack emissions limitations shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03.

4. Emissions Limitation:
Five-percent opacity, as a three-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the Rotary dryer, feed hopper, screen, and associated bins operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed

in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

5. Emissions Limitation:
PE: 0.03 pound per hour

Applicable Compliance Method:

To determine the actual particulate emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

6. Emissions Limitation:
PE: 0.13 ton per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

7. Emissions Limitation:
NOx: 0.34 pound per hour

Applicable Compliance Method:

To determine the actual NOx emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

8. Emissions Limitation:
NOx: 1.5 tons per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

9. Emissions Limitation:
CO: 0.29 pound per hour

Applicable Compliance Method:

To determine the actual CO emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

10. Emissions Limitation:
CO: 1.3 tons per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

11. The permittee 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 6 months following issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northeast District Office.
 - d. The test(s) shall be conducted while the emissions unit is operating at maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northeast District Office 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional

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time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

- 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>
Rotary dryer 4, feed hopper, screen, silo, and associated bins with a baghouse	OAC rule 3745-31-05(A)(3)
Direct fired fuel burning equipment	OAC rule 3745-17-07(B)
	OAC rule 3745-17-08(B)
	OAC rule 3745-17-11

Emissions Unit ID: P004

Applicable Emissions
 Limitations/Control Measures

OAC rule 3745-31-05 (A)(3)

PE: 0.02 grain per dry standard cubic foot of exhaust gases, 1.4 pounds per hour, and 6.1 tons per year

NOx: 0.51 pound per hour and 2.2 tons per year (from natural gas combustion)

CO: 0.43 pound per hour and 1.9 tons per year (from natural gas combustion)

Visible particulate emissions from the stack shall not exceed five-percent opacity, as a six-minute average.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible fugitive particulate emissions shall not exceed five-percent opacity, as a three-minute average.

The requirements established pursuant to this rule are equivalent to the requirements of OAC 3745-21-08.

OAC rule 3745-17-11

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The requirements established pursuant to this rule are equivalent to the requirements of OAC 3745-23-06.

OAC rule 3745-21-08

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-23-06

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

PE: 0.04 pound per hour and 0.18 ton per year (from natural gas combustion)

2. Additional Terms and Conditions

- 2.a The collection efficiency of the baghouse control system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
2. The permittee shall regularly maintain the baghouse control equipment associated with this emissions unit in accordance with the manufacturer's recommendations. Maintenance shall include regular repair and or replacement of filters/bags so as to maximize the particulate collection efficiency of the control system.
3. Enclosures shall be located at those points necessary to ensure compliance with the visible emission limitations specified in this permit for screening, conveying, and transfer.
4. The permittee shall burn only natural gas in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis and record the number of days following a media change that are required to meet the minimum pressure drop.
2. The permittee shall maintain daily records of the type and amount of material processed through this emissions unit.
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) and any fugitive egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;

- b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviations (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) and/or any fugitive egress points serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northeast District Office of the Ohio EPA) and shall cover the previous 6-month period.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall submit opacity deviation (excursion) reports that identify all periods of time during which the emissions unit did not comply with the opacity limits specified above. These reports shall include the average opacity observed, in three or six-minute blocks, the process weight rate during the observation period and the type of material being processed.
5. The deviation (excursion) reports shall be submitted in accordance with reporting requirements of the General Terms and Conditions of this permit.
6. The permittee shall submit deviation (excursion) reports that identify any of the following occurrences:

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- 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.

E. Testing Requirements

1. Emissions Limitations:

PE: 1.4 pounds per hour and 0.02 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the particulate emission rates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03.

2. Emissions Limitation:

PE: 6.1 tons per year

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (1.4 lb/hr) multiplied by the maximum possible operating hours (8760 hr/yr), and divided by 2000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

3. Emissions Limitation:

Five-percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance with the allowable visible stack emissions limitations shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03.

4. Emissions Limitation:

Five-percent opacity, as a three-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the Rotary dryer, feed hopper, screen, silo, and associated bins operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of

Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

5. Emissions Limitation:
PE: 0.04 pound per hour

Applicable Compliance Method:

To determine the actual particulate emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

6. Emissions Limitation:
PE: 0.18 ton per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

7. Emissions Limitation:
NOx: 0.51 pound per hour

Applicable Compliance Method:

To determine the actual NOx emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

8. Emissions Limitation:
NOx: 2.2 tons per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

9. Emissions Limitation:
CO: 0.43 pound per hour

Applicable Compliance Method:

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To determine the actual CO emission rate for natural gas combustion, emission factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98) shall be used.

10. Emissions Limitation:
CO: 1.9 tons per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements specified in Section C above and the emissions factors outlined in AP-42, Section 1.4 (Natural Gas Combustion-Fifth Edition, 3/98).

11. The permittee 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 6 months following issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northeast District Office.
 - d. The test(s) shall be conducted while the emissions unit is operating at maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northeast District Office 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.

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A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office 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 Ohio EPA, Northeast District Office.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
Air flow bagging system and feed hopper with a baghouse	OAC rule 3745-31-05(A)(3)	PE: 0.02 grain per dry standard cubic foot of exhaust gases, 0.32 pound per hour, and 1.4 tons per year
	OAC rule 3745-17-07(B)	Visible particulate emissions from the stack shall not exceed five-percent opacity, as a six-minute average.
	OAC rule 3745-17-11	Visible fugitive particulate emissions shall not exceed five-percent opacity, as a three-minute average.
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

Emissions Unit ID: P005

- 2.a The collection efficiency of the baghouse control system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
2. The permittee shall regularly maintain the baghouse control equipment associated with this emissions unit in accordance with the manufacturer's recommendations. Maintenance shall include regular repair and or replacement of filters/bags so as to maximize the particulate collection efficiency of the control system.
3. Enclosures shall be located at those points necessary to ensure compliance with the visible emission limitations specified in this permit for screening, conveying, and transfer.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis and record the number of days following a media change that are required to meet the minimum pressure drop.
2. The permittee shall maintain daily records of the type and amount of material processed through this emissions unit.
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) and any fugitive egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the

abnormal emissions;

- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviations (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) and/or any fugitive egress points serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northeast District Office of the Ohio EPA) and shall cover the previous 6-month period.
3. The permittee shall submit opacity deviation (excursion) reports that identify all periods of time during which the emissions unit did not comply with the opacity limits specified above. These reports shall include the average opacity observed, in three or six-minute blocks, the process weight rate during the observation period and the type of material being processed.
4. The deviation (excursion) reports shall be submitted in accordance with reporting requirements of the General Terms and Conditions of this permit.
5. The permittee shall submit deviation (excursion) 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.

E. Testing Requirements

1. Emissions Limitations:
PE: 0.32 pound per hour and 0.02 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:
Compliance with the particulate emission rates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03.
2. Emissions Limitation:
PE: 1.4 tons per year

Applicable Compliance Method:
This limit is based on the allowable hourly emission limit (0.32 lb/hr) multiplied by the maximum possible operating hours (8760 hr/yr), and divided by 2000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
3. Emissions Limitation:
Five-percent opacity, as a six-minute average.

Applicable Compliance Method:
Compliance with the allowable visible stack emissions limitations shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03.
4. Emissions Limitation:
Five-percent opacity, as a three-minute average.

Applicable Compliance Method:
Compliance with the visible emission limitation for the air flow bagging system and feed hopper operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
5. The permittee 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 6 months following issuance of this permit.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northeast District Office.
- d. The test(s) shall be conducted while the emissions unit is operating at maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northeast District Office 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office 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 Ohio EPA, Northeast District Office.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
Twin air flow bagging system and feed hopper with a baghouse	OAC rule 3745-31-05(A)(3)	PE: 0.02 grain per dry standard cubic foot of exhaust gases, 0.32 pound per hour, and 1.4 tons per year
	OAC rule 3745-17-07(B)	Visible particulate emissions from the stack shall not exceed five-percent opacity, as a six-minute average.
	OAC rule 3745-17-11	Visible fugitive particulate emissions shall not exceed five-percent opacity, as a three-minute average.
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The collection efficiency of the baghouse control system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
2. The permittee shall regularly maintain the baghouse control equipment associated with this emissions unit in accordance with the manufacturer's recommendations. Maintenance shall include regular repair and or replacement of filters/bags so as to maximize the particulate collection efficiency of the control system.
3. Enclosures shall be located at those points necessary to ensure compliance with the visible emission limitations specified in this permit for screening, conveying, and transfer.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis and record the number of days following a media change that are required to meet the minimum pressure drop.
2. The permittee shall maintain daily records of the type and amount of material processed through this emissions unit.
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) and any fugitive egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the

abnormal emissions;

- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviations (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) and/or any fugitive egress points serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northeast District Office of the Ohio EPA) and shall cover the previous 6-month period.
3. The permittee shall submit opacity deviation (excursion) reports that identify all periods of time during which the emissions unit did not comply with the opacity limits specified above. These reports shall include the average opacity observed, in three or six-minute blocks, the process weight rate during the observation period and the type of material being processed.
4. The deviation (excursion) reports shall be submitted in accordance with reporting requirements of the General Terms and Conditions of this permit.
5. The permittee shall submit deviation (excursion) 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.

E. Testing Requirements

1. Emissions Limitations:
PE: 0.32 pound per hour and 0.02 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:
Compliance with the particulate emission rates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03.
2. Emissions Limitation:
PE: 1.4 tons per year

Applicable Compliance Method:
This limit is based on the allowable hourly emission limit (0.32 lb/hr) multiplied by the maximum possible operating hours (8760 hr/yr), and divided by 2000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
3. Emissions Limitation:
Five-percent opacity, as a six-minute average.

Applicable Compliance Method:
Compliance with the allowable visible stack emissions limitations shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03.
4. Emissions Limitation:
Five-percent opacity, as a three-minute average.

Applicable Compliance Method:
Compliance with the visible emission limitation for the twin air flow bagging system and feed hopper operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
5. The permittee 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 6 months following issuance of this permit.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northeast District Office.
- d. The test(s) shall be conducted while the emissions unit is operating at maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northeast District Office 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office 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 Ohio EPA, Northeast District Office.

F. Miscellaneous Requirements

None