

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 02-22947

A. Source Description

P902 is planned to be constructed and operated once the PTI is issued. P902 is a truck load-out shed that will be utilized to reduce emissions when materials are transferred from piles or process areas to outbound trucks. This emissions unit is also one of two SEPs required by a USEPA enforcement document and a proposed control measure to reduce emissions in the draft Director's Findings and Orders.

B. Facility Emissions and Attainment Status

Facility emissions from the SH Bell/Stateline Terminal are viewed to be over Title V thresholds, e.g., over 10 tpy of individual HAPs and over 25 tpy of total combined HAPs. The HAPs are manganese and chromium in the particulate matter. The FESOP application submitted to NEDO in 2004 has been reviewed. However, the facility has reportedly made changes to the proposed voluntary restrictions. NEDO is still waiting for those revisions to the application.

SH Bell/Stateline facility is located in Columbiana County, which is designated attainment for both PM 2.5 and ozone.

C. Source Emissions

P902 will emit particulates. The particulates include PM-10, chromium and manganese. Cr and Mn emissions are assumed to be a percentage of the particulate emissions (not PM-10). The percentage is determined by the reported maximum content of the element in the materials that are handled by the facility.

P902 will be located in a building. The building will be maintained under negative pressure so that emissions generated by the drop will be captured and controlled by a baghouse. Overall control efficiency will be 98% (99% capture and 99% control by the baghouse), which is based on engineering judgment. The 99% capture by the building is accepted because the inlet fan to the baghouse is designed at 45,000 acfm, which should create an inward flow of at least 200 fpm. The inward flow of 200 fpm is a criteria in Method 204 for demonstrating an enclosure is a permanent or temporary total enclosure capturing 100% of volatile organic compound emissions, and is being utilized as a guideline for application to particulate emissions, since a direct method for enclosure of particulates does not exist. Reasonably available control measures are included in this permit to assist with capturing the emissions generated by this emissions unit.

D. Conclusion

The proposed voluntary restrictions of use of the baghouse, RACM, and a maximum throughput will allow emissions to be low. The low allowables will assist the facility in obtaining a FESOP status, when revisions to that application are submitted.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 02-22947

Fac ID: 0215020225

DATE: 4/29/2008

SH Bell Company
John Bedeck
2217 Michigan Ave
East Liverpool, OH 15238

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1250** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO

EASTGATE DEV & TRANS STUDY

PA

WV

COLUMBIANA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-22947** FOR AN AIR CONTAMINANT SOURCE
FOR **SH Bell Company**

On 4/29/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **SH Bell Company**, located at **2217 Michigan Ave, East Liverpool**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22947:

Ohio Side Product Truck Loadout.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-22947

Application Number: 02-22947
Facility ID: 0215020225
Permit Fee: **To be entered upon final issuance**
Name of Facility: SH Bell Company
Person to Contact: John Bedeck
Address: 2217 Michigan Ave
East Liverpool, OH 15238

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2217 Michigan Ave
East Liverpool, Ohio**

Description of proposed emissions unit(s):
Ohio Side Product Truck Loadout.

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

Chris Korleski
Director

SH Bell Company

PTI Application: 02-22947

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0215020225

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)

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,

SH Bell Company**Facility ID: 0215020225****PTI Application: 02-22947****Issued: To be entered upon final issuance**

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

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Rolling 12-months</u>
PE	0.16 from stack 0.16 as fugitive
PM10	0.08 from stack 0.08 as fugitive
Chromium	0.03 from stack 0.03 as fugitive
Manganese	0.03 from stack 0.03 as fugitive

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

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

Operations, Property, and/or Equipment - (P902) - Ohio Side Product Truck Loadout Shed, equipped with a baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
<p>OAC rule 3745-31-05(C)</p> <p>(voluntary restrictions to avoid Title V permitting and BAT)</p>	<p>See sections A.2.a and A.2.b.</p> <p>Particulate emissions (PE) from the stack shall not exceed 0.16 ton per rolling, 12-month period.</p> <p>Particulate emissions less than 10 microns in diameter (PM-10) from the stack shall not exceed 0.08 ton per rolling, 12-month period.</p> <p>Chromium (Cr) emissions from the stack shall not exceed 0.03 ton per rolling, 12-month period (see section B.2).</p> <p>Manganese (Mn) emissions from the stack shall not exceed 0.03 ton per rolling, 12-month period.</p> <p>Visible particulate emissions from the stack shall not exceed 5% opacity, as a 3-minute average.</p> <p>Visible emissions of fugitive dust from the egress points (i.e., doors to the building) shall not exceed 5% opacity, as a 3-minute average.</p>
<p>OAC rule 3745-17-07(A)(1)</p>	<p>The visible particulate emission limitation specified by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(C).</p>
<p>OAC rule 3745-17-07(B)</p>	<p>The visible emission limitation specified by this applicable rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(C).</p>

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OAC rule 3745-17-08(B)	The permittee shall utilize reasonably available control measures (RACM) appropriate to minimize or eliminate visible emissions of fugitive dust. See section A.2.b.
OAC rule 3745-17-11(B)(1)	The particulate emission limitation specified by this applicable rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(C).
OAC rule 3745-114-01	See section C.5 below.

2. Additional Terms and Conditions

2.a Permit-to-Install 02-22947 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee:

- i. The baghouse shall be in operation whenever this emissions unit is in operation.
- ii. The maximum material throughput shall be 889,500 tons per rolling, 12-month period.

2.b "Reasonably available control measures" means the control technology which enables a particular fugitive dust source to achieve the lowest particulate matter emission level possible and which is reasonably available considering technological feasibility and cost-effectiveness. RACM for this air contaminant source shall include, but not be limited to, the following:

- i. The baghouse system shall be designed and operated to create a negative pressure at building openings so that there is an inward flow during operation of this emissions unit. The design shall be based on a nominal air velocity rate of 200 feet per minute at building openings. The amperage of the fan at the inlet of the baghouse shall be maintained at or above the minimum value that provides an inward flow of air at the nominal air velocity specified above. The minimum fan amperage shall be established by the manufacturer during the design of the baghouse system and verified during the initial emissions test as specified in section E.2.
- ii. The overhead doors for truck entrance and exit shall be in the closed position while this air contaminant source is in operation.
- iii. The vinyl strips over the door used for the front-end loader, or similar

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vehicle, shall be kept in good condition.

- iv. A tunnel-like structure shall be maintained over the opening where the front-end loader, or similar vehicle, enters the enclosure. This structure shall serve to reduce the effects of cross draft winds on the face of the enclosure and channel the in-draft air around the loader as it breaks the plane of the enclosure opening.

B. Operational Restrictions

1. During the first twelve (12) months of operation under this permit, the material throughput for this emissions unit shall not exceed the cumulative total amount specified for each month in the following table:

<u>Calendar Month</u>	<u>Cumulative Allowable Total Amount</u>
1	74,125 tons
2	148,250 tons
3	222,375 tons
4	296,500 tons
5	370,625 tons
6	444,750 tons
7	518,875 tons
8	593,000 tons
9	667,125 tons
10	741,250 tons
11	815,375 tons
12	889,500 tons

2. The permittee shall not employ any hexavalent chromium in this emissions unit. Only ferrocromium shall be employed in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop in inches of water 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 manuals. The permittee shall record the pressure drop in inches of water across the baghouse on a weekly basis.

Based on manufacturer's specifications, the acceptable pressure drop range across the

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baghouse is 1.0 to 6.0 inches of water.

2. The permittee shall properly install, operate, and maintain equipment to monitor the amperage of the fan at the inlet of 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 manuals. The permittee shall record the amperage on a weekly basis.
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 and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
4. The permittee shall record the following information for each month of operation for this emissions unit:
 - a. the total amount, in tons, of material handled; and
 - b. the cumulative total amount, in tons, of material handled over the past rolling, 12-month period.
5. The permittee shall calculate and record the following emission rates each month by using the following equations:
 - a. PE from the stack:

$$PE = M \times EF \times \text{ton}/2,000 \text{ lbs} \times C$$

where:

$$PE = \text{tons particulate per rolling 12-months.}$$

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- M = amount of material handled, in tons, as recorded in section C.4.b.
- EF = emission Factor, in lb PE /ton, as calculated by Equation (1) in AP-42, 13.2.4 (1/95) or most recent version. The selected "k" value for PE in equation (1) shall represent a particle size less than 30 micrometers.
- C = weight fraction emitted from the stack, which is $[(1-0.01)(1-0.99)]$, or 0.01. Not less than 99% of the generated emissions are estimated to be captured. The captured emissions are controlled by a baghouse with a control efficiency of not less than 99%.

b. PM-10 emissions from the stack:

$$\text{PM-10} = M \times \text{EF} \times \text{ton}/2,000 \text{ lbs} \times C$$

where:

PM-10= tons PM-10 per rolling 12-months.

- M = amount of material handled, in tons, as recorded in section C.4.b.
- EF = emission Factor, in lb PE or PM-10/ton, as calculated by Equation (1) in AP-42, 13.2.4 (1/95) or most recent version. The selected "k" value for PM-10 in equation (1) shall represent a particle size less than 10 micrometers.
- C = weight fraction emitted from the stack, which is $[(1-0.01)(1-0.99)]$, or 0.01. Not less than 99% of the generated emissions are estimated to be captured. The captured emissions are controlled by a baghouse with a control efficiency of not less than 99%.

c. Cr emissions from the stack:

$$\text{Cr} = \text{PE} \times (\% \text{Cr} / 100)$$

where:

Cr = tons chromium per rolling 12-months.

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PE = tons particulate from stack per rolling 12-months, as calculated in section C.5.a.

%Cr = 18.9 (The PTI application reports the maximum elemental chromium content of the materials is 18.9%. If the actual elemental chromium content of the handled materials becomes higher, the higher decimal value shall be used.)

d. Mn emissions from the stack:

Mn = PE x (%Mn / 100)

where:

Mn = tons manganese per rolling 12-months.

PE = tons particulate from stack per rolling 12-months, as calculated in section C.5.a.

%Mn = 20 (The PTI application reports the maximum elemental manganese content of the materials is 20%. If the actual elemental manganese content of the handled materials becomes higher, the higher decimal value shall be used.)

6. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. the month when the cumulative total amount of material handled by this emissions unit exceeds the specified amount in section B.1;

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- b. after the first twelve (12) months of operation, each month when the total amount of material handled by this emissions unit exceeds 889,500 tons per rolling, 12-month period, and the actual amount in tons per rolling, 12-month period;
- c. each month when the PE, PM-10, Cr, and/or Mn emission rates exceed the respective tons per rolling, 12-month emission limitations, and the actual amount in tons PE, PM-10, Cr, and/or Mn per rolling, 12-month period;
- d. any time (date) when the baghouse was inoperable or not used while this emissions unit was in operation;
- e. any period of time when the pressure drop across the baghouse was outside the reported acceptable range of 1.0 to 6.0 inches of water (this report shall include a description of the corrective action(s) taken to bring the pressure drop back within the acceptable range and, if no corrective action was taken, the report shall include the reason);
- f. any time (date) when reasonably available control measures as specified in section A.2.b were not employed or maintained; and
- g. any time (date) when the amperage of the fan at the inlet of the baghouse is less than the minimum value established and verified during the initial emissions test as specified in section E.2.

The calendar quarters are January 1 - March 31, April 1 - June 30, July 1 - September 30, and October 1 - December 31. The quarterly deviation reports shall be submitted to the Ohio EPA Northeast District Office quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

If no deviations occurred during a calendar quarter, the permittee shall still submit a quarterly report which states that no deviations occurred during the quarter.

- 2. The permittee shall submit semiannual written reports that identify the following:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., doors) serving this emissions unit; and

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- c. a description of any corrective actions taken to reduce or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

These reports shall be submitted to the Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month periods.

If no deviations occurred during a 6-month period, the permittee shall still submit a semiannual report which states that no deviations occurred during the 6-month period.

E. Testing Requirements

1. Compliance with the emission limitations and control measures in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

PE from the stack shall not exceed 0.16 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements specified in section C.

- b. Emission Limitation:

PM-10 emissions from the stack shall not exceed 0.08 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements specified in section C.

- c. Emission Limitation:

Cr emissions from the stack shall not exceed 0.03 ton per rolling, 12-month period.

Applicable Compliance Method:

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Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements specified in section C.

d. Emission Limitation:

Mn emissions from the stack shall not exceed 0.03 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements specified in section C.

e. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 5% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9.

f. Emission Limitation:

Visible emissions of fugitive dust from the egress points (i.e., doors to the building) shall not exceed 5% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;

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- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

g. Reasonably Available Control Measures:

The baghouse system shall be designed and operated to create a negative pressure at building openings so that there is an inward flow during operation of this emissions unit. The design shall be based on a nominal air velocity rate of 200 feet per minute at building openings. The amperage of the fan at the inlet of the baghouse shall be maintained at or above the minimum value that provides an inward flow of air at the nominal air velocity specified above. The minimum fan amperage shall be established by the manufacturer during the design of the baghouse system and verified during the initial emissions test as specified in section E.2.

The overhead doors for truck entrance and exit shall be in the closed position while this air contaminant source is in operation.

The vinyl strips over the door used for the front-end loader, or similar vehicle, shall be kept in good condition.

A tunnel-like structure shall be maintained over the opening where the front-end loader, or similar vehicle, enters the enclosure. This structure shall serve to reduce the effects of cross draft winds on the face of the enclosure and channel the in-draft air around the loader as it breaks the plane of the enclosure opening.

Applicable Compliance Method:

Compliance with the above requirements shall be demonstrated by compliance with the limitation of visible emissions of fugitive dust, as specified in section E.1.f.

Compliance shall also be demonstrated through documentation of construction in accordance with the design basis and manufacturers specifications and through the documentation of operation and maintenance in accordance with the manufacturer's specifications and good engineering practices.

Emissions Unit ID: **P902**

2. 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 3 months after start-up.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE, Cr, Mn, and opacity in the appropriate averaging period(s).
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for PE: Methods 1 through 5 of 40 CFR Part 60, Appendix A;
for Cr: Methods 1 through 5 and 29 of 40 CFR Part 60, Appendix A;
for Mn: Methods 1 through 5 and 29 of 40 CFR Part 60, Appendix A; and
for opacity: Method 9 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - e. The amperage of the fan at the inlet to the baghouse shall be measured and recorded during each of 3 runs that demonstrate compliance with the particulate emission limitation specified in section A.1.
 - f. The pressure drop across the baghouse shall be measured and recorded during each of 3 runs that demonstrate compliance with the particulate emission limitation specified in section A.1.

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

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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

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A, B, C.1 - C.5, D and E.

SH Bell Company
PTI Application: 02-22947
Issued: To be entered upon final issuance

Facility ID: 0215020225

Emissions Unit ID: **P902**

SIC CODE 4225 SCC CODE _____ EMISSIONS UNIT ID P902
 EMISSIONS UNIT DESCRIPTION Ohio Side Product Truck Loadout Shed, equipped with a baghouse
 DATE INSTALLED upon PTI issuance

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Rolling 12-months	Short Term Rate	Tons Per Rolling 12-months
Particulate Matter	attainment		0.16		0.16
PM ₁₀			0.08		0.08
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Chromium			0.03		0.03
Manganese			0.03		0.03

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

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

Enter Determination NA

Restricted limitations as volunteered by permittee calculated using EF from AP-42, 13.2.4, a restricted throughput of 889,500 tons/rolling, 12-month period, use of a baghouse, and employment/maintenance of RACM.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

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

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AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____