

Facility ID: 0278060791 Issuance type: Final State Permit To Operate

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

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

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

[Go to Part II for Emissions Unit F002](#)  
[Go to Part II for Emissions Unit P001](#)  
[Go to Part II for Emissions Unit P002](#)

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Facility ID: 0278060791 Emissions Unit ID: F002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - ball mills	OAC rule 3745-31-05(A)(3) (PTI 02-20417)	Particulate emissions (PE) shall not exceed 4.5 pounds per hour and 5.6 tons per year.
	OAC rule 3745-17-07(B)	See section B.1 below. Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**
  - (a) None

**B. Operational Restrictions**

1. The ball mill load hoppers shall be covered or closed while the emissions units are in operation.

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e. material hoppers) serving this emissions unit. The presence or absence of any visible fugitive 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 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; and
  - d. any corrective actions taken to minimize or eliminate the visible emissions.

If observed visible fugitive emissions are not representative of normal operations, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall perform daily checks, when the emissions unit is in operation, of the integrity of the hooding, covering, or enclosure on this emissions unit that is used to reduce fugitive dust emissions. If the hooding, covering, or enclosure on this emissions unit is not functioning properly, this shall be noted in an operations log.

The permittee shall also shut down the operation of the emissions unit and make any repairs necessary to restore the integrity of the fugitive dust control aids.

3. The permittee shall maintain monthly records of the amount of titanium grindings processed, in pounds or tons.

**D. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., material load hoppers) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports that identify all days during which it was observed that the hooding, covering, or enclosure on this emissions unit was not functioning properly, and the emissions unit was not shut down to repair the problem. The reason repairs were not made shall also be included in this report. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit an annual report that summarizes the amount of titanium grindings processed, in pounds or tons.

**E. Testing Requirements**

1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated by visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

Emission Limitation:

PE shall not exceed 4.5 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be based on a one time calculation by using emission factors from AP-42, Compilation of Air Pollution Emission Factors, Section 11.12 for loading (0.61 lb/ton processed), and from AP-42, Section 11.24 for mixing (2.4 lbs/ton processed), assuming 50% control for the ball mill mixer enclosure [  $0.61 + (2.4 \times 0.5) = 1.81$  lbs/ton processed], and the maximum process weight rate from the application.

$E(PE)_{dryer} = 1.81 \text{ lbs/ton} \times 2.5 \text{ tons/hr}$ , maximum titanium grindings = 4.5 lbs/hr of PE.

If required, compliance with the hourly emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

Emission Limitation:

PE shall not exceed 5.6 tons per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor (1.81 lbs/ton) by the annual production rate (summation of section C.3), and then dividing by 2000 lbs/ton.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 0278060791 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - drying furnace No.1 rotary dryer	OAC rule 3745-31-05(A)(3) (PTI 02-20417)	Particulate emissions (PE) shall not exceed 6.7 pounds per hour and 6.7 tons per year.
rotary dryer	OAC rule 3745-17-07(B)	See sections B.1 and B.2 below.
rotary dryer	OAC rule 3745-17-11	Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a 3-minute average.
wood fired heater	OAC rule 3745-31-05(A)(3) (PTI 02-20417)	The emission limitation required by this applicable rule is less stringent than or equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). PE shall not exceed 1.4 pounds per hour and 1.4 tons per year.
wood fired heater	OAC rule 3745-17-07(A)	See section B.3 below.
wood fired heater	OAC rule 3745-17-11	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

- (a) None

**B. Operational Restrictions**

1. The permittee shall employ an enclosure surrounding the dried material hopper, and it shall be kept closed during dryer operation, except for hopper change out or emptying.
2. The permittee shall employ an enclosure on the conveyor feeding material to the dryer, and on the dryer entrance.
3. The wood used as fuel shall be fired wet to reduce emissions (per USEPA AP-42, Compilation of Air Pollution Emission Factors, Section 1.6, Table 1.6-1). The permittee shall notify the Ohio EPA Northeast District Office if there is any change to the fuel used in this emissions unit. Any change may result in requiring a permit modification.

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

1. 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 fugitive particulate emissions from the egress points (i.e., dryer fuel stack, conveyor, material inlet and outlet) 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 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; and
  - d. any corrective actions taken to minimize or eliminate the visible emissions.

If observed visible emissions are not representative of normal operations, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
2. The permittee shall perform daily checks, when the emissions unit is in operation of the integrity of the hooding, covering, or enclosure on this emissions unit that is used to reduce fugitive dust emissions. If the hooding, covering, or enclosure on this emissions unit is not functioning properly, this shall be noted in an operations log. The permittee shall also shut down the operation of the emissions unit and make any repairs necessary to restore the integrity of the fugitive dust control aids.
3. The permittee shall maintain monthly records of the following information:
  - a. the amount of titanium grindings dried, in pounds or tons; and
  - b. the amount of wood fuel used, in pounds or tons.

**D. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack or egress points (i.e., dryer fuel stack, material inlet and outlet) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions or visible fugitive particulate emissions. This report shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year and shall cover the previous 12-month period.
2. The permittee shall submit semiannual written reports that identify all days during which it was observed that hooding, covering, or enclosure on this emissions unit was not functioning properly, and the emissions unit was not shut down to repair the problem. The reason repairs were not made shall also be included in this report. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit an annual report that summarizes the following:
  - a. the amount of titanium grindings dried, in pounds or tons; and
  - b. the amount of wood fuel used, in pounds or tons.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a 3-minute average.  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).  
Emission Limitation:  
  
Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).  
Emission Limitation:  
  
PE from the rotary dryer shall not exceed 6.7 pounds per hour.  
  
Applicable Compliance Method:  
  
Compliance with the hourly emission limitation may be based on a one time calculation by multiplying the particulate emission factor from AP-42, Section 11.19 (1995 update) for rotary drying (2 lbs/ton processed) by the maximum process weight rate from the application.  
  
$$E(\text{PE})_{\text{dryer}} = 2 \text{ lbs/ton} \times 2.1 \text{ maximum titanium grindings in tons/hr} = 4.2 \text{ lbs/hr of PE.}$$
  
  
If required, compliance with the hourly emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).  
Emission Limitation:  
  
PE from the rotary dryer shall not exceed 6.7 tons per year.  
  
Applicable Compliance Method:  
  
Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor (2 lbs/ton processed) by the annual production rate (summation of section C.3), and then dividing by 2000 lbs/ton.  
Emission Limitation:  
  
PE from the fuel shall not exceed 1.4 pounds per hour.  
  
Applicable Compliance Method:  
  
Compliance with the hourly emission limitation shall be demonstrated by multiplying the particulate emission factor from AP-42, Section 1.6 (2003 update) for wet wood combustion (0.33 lb/mmBtu) by the maximum heat input from the application.  
  
$$E(\text{PE})_{\text{fuel}} = 0.33 \text{ lb/mmBtu} \times 3.6 \text{ mmBtu/hr} = 1.2 \text{ lbs/hr of PE}$$
  
  
If required, compliance with the hourly emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).  
Emission Limitation:  
  
PE from the fuel shall not exceed 1.4 tons per year.  
  
Applicable Compliance Method:  
  
Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor (0.33

lb/mmBtu) by the annual fuel usage rate (summation of section C.3) and by 8600 Btu/lb of wood, and then dividing by 2000 lbs/ton.

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 0278060791 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - drying furnace No.2 rotary dryer	OAC rule 3745-31-05(A)(3) (PTI 02-20417)	Particulate emissions (PE) shall not exceed 6.7 pounds per hour and 6.7 tons per year.
rotary dryer	OAC rule 3745-17-07(B)	See sections B.1 and B.2 below.
rotary dryer	OAC rule 3745-17-11	Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a 3-minute average.
wood fired heater	OAC rule 3745-31-05(A)(3) (PTI 02-20417)	The emission limitation required by this applicable rule is less stringent than or equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). PE shall not exceed 1.4 pounds per hour and 1.4 tons per year.
wood fired heater	OAC rule 3745-17-07(A)	See section B.3 below.
wood fired heater	OAC rule 3745-17-11	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- 2. **Additional Terms and Conditions**
  - (a) None

**B. Operational Restrictions**

- 1. The permittee shall employ an enclosure surrounding the dried material hopper, and it shall be kept closed during dryer operation, except for hopper change out or emptying.
- 2. The permittee shall employ an enclosure on the conveyor feeding material to the dryer, and on the dryer entrance.
- 3. The wood used as fuel shall be fired wet to reduce emissions (per USEPA AP-42, Compilation of Air Pollution Emission Factors, Section 1.6, Table 1.6-1). The permittee shall notify the Ohio EPA Northeast District Office if there is any change to the fuel used in this emissions unit. Any change may result in requiring a permit modification.

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

- 1. 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 fugitive particulate emissions from the egress points (i.e., dryer fuel stack, conveyor, material inlet and outlet) 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 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; and
- d. any corrective actions taken to minimize or eliminate the visible emissions.

If observed visible emissions are not representative of normal operations, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- 2. The permittee shall perform daily checks, when the emissions unit is in operation of the integrity of the hooding, covering, or enclosure on this emissions unit that is used to reduce fugitive dust emissions. If the hooding, covering, or enclosure on this emissions unit is not functioning properly, this shall be noted in an operations log. The permittee shall also shut down the operation of the emissions unit and make any repairs necessary to restore the integrity of the fugitive dust control aids.
  - 3. The permittee shall maintain monthly records of the following information:
    - a. the amount of titanium grindings dried, in pounds or tons; and
    - b. the amount of wood fuel used, in pounds or tons.
- D. Reporting Requirements**
- 1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack or egress points (i.e., dryer fuel stack, material inlet and outlet) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions or visible fugitive particulate emissions. This report shall be submitted to the Ohio EPA Northeast District Office by January 31 of each year and shall cover the previous 12-month period.
  - 2. The permittee shall submit semiannual written reports that identify all days during which it was observed that hooding, covering, or enclosure on this emissions unit was not functioning properly, and the emissions unit was not shut down to repair the problem. The reason repairs were not made shall also be included in this report. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
  - 3. The permittee shall submit an annual report that summarizes the following:
    - a. the amount of titanium grindings dried, in pounds or tons; and
    - b. the amount of wood fuel used, in pounds or tons.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
Visible particulate emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a 3-minute average.  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B) (3).  
Emission Limitation:  
  
Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B) (1).  
Emission Limitation:  
  
PE from the rotary dryer shall not exceed 6.7 pounds per hour.  
  
Applicable Compliance Method:  
  
Compliance with the hourly emission limitation may be based on a one time calculation by multiplying the particulate emission factor from AP-42, Section 11.19 (1995 update) for rotary drying (2 lbs/ton processed) by the maximum process weight rate from the application.  
  
 $E(PE)_{dryer} = 2 \text{ lbs/ton} \times 2.1 \text{ maximum titanium grindings in tons/hr} = 4.2 \text{ lbs/hr of PE.}$   
  
If required, compliance with the hourly emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

## Emission Limitation:

PE from the rotary dryer shall not exceed 6.7 tons per year.

## Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor (2 lbs/ton processed) by the annual production rate (summation of section C.3), and then dividing by 2000 lbs/ton.

## Emission Limitation:

PE from the fuel shall not exceed 1.4 pounds per hour.

## Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by multiplying the particulate emission factor from AP-42, Section 1.6 (2003 update) for wet wood combustion (0.33 lb/mmBtu) by the maximum heat input from the application.

$$E(\text{PE})_{\text{fuel}} = 0.33 \text{ lb/mmBtu} \times 3.6 \text{ mmBtu/hr} = 1.2 \text{ lbs/hr of PE}$$

If required, compliance with the hourly emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

## Emission Limitation:

PE from the fuel shall not exceed 1.4 tons per year.

## Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor (0.33 lb/mmBtu) by the annual fuel usage rate (summation of section C.3) and by 8600 Btu/lb of wood, and then dividing by 2000 lbs/ton.

F. **Miscellaneous Requirements**

1. None