



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

10/28/2011

Certified Mail

Andy Cvitkovich  
US Gypsum Company  
Lake Street  
Gypsum, OH 43433

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0362000078  
Permit Number: P0105334  
Permit Type: Initial Installation  
County: Ottawa

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

Dear Permit Holder:

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

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA  
Ohio EPA-NWDO; Michigan; Canada





## Response to Comments

Facility ID:	0362000078
Facility Name:	US Gypsum Company
Facility Description:	Gypsum products
Facility Address:	Lake Street Gypsum, OH 43433 Ottawa County
Permit:	P0105334, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Port Clinton News Herald on 08/11/2011. The comment period ended on 09/10/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

**1. Topic: No public comments.**

- a. Comment: None
- b. Response: None

**2. Topic: USG Comments.**

- a. Comment: 1 For the Perlite Expander (P003), natural gas fuel burning emissions should include PM10 emissions at 0.02 lb/hr and 0.07ton/yr.
- b. Response: This emissions unit is direct fired, with an outlet grain loading for an allowable, therefore the requested addition is not needed.
- c. Comment: 2 For the Perlite Expander (P003), USG would like clarification on how the maximum volumetric airflow rate (8,510 acfm) listed in section (f) was determined.
- d. Response: Due to the elevated temperature of the stack gas, a correction was applied based on the volumetric flow at standard temperature conditions. This reduced airflow would be reflective of the calculations performed during a stack test, to standardize flow.
- e. Comments: 3, GFP Blue Inking Station (R008) is no longer in use and should be removed from the permit.
- f. Response: R008 was removed from the permit.





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
US Gypsum Company**

Facility ID:	0362000078
Permit Number:	P0105334
Permit Type:	Initial Installation
Issued:	10/28/2011
Effective:	10/28/2011





Division of Air Pollution Control
Permit-to-Install
for
US Gypsum Company

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## Authorization

Facility ID: 0362000078  
Facility Description: Gypsum products  
Application Number(s): A0038076  
Permit Number: P0105334  
Permit Description: This action is to re-permit 13 sources, and establish federally enforceable limits for the following emission units: P003, P010, P019, P020, P021, P022, P023, P036, P037, P038, P039, P040, P041 and P043, to keep the facility below PSD levels.  
Permit Type: Initial Installation  
Permit Fee: \$6,425.00  
Issue Date: 10/28/2011  
Effective Date: 10/28/2011

This document constitutes issuance to:

US Gypsum Company  
Lake Street  
Gypsum, OH 43433

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

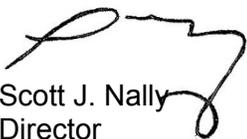
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0105334

Permit Description: This action is to re-permit 13 sources, and establish federally enforceable limits for the following emission units: P003, P010, P019, P020, P021, P022, P023, P036, P037, P038, P039, P040, P041 and P043, to keep the facility below PSD levels.

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

<b>Emissions Unit ID:</b>	<b>B006</b>
Company Equipment ID:	82 mmBTU/hr Natural Gas Fired Boiler
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F005</b>
Company Equipment ID:	Paved Roads & Parking Areas
Superseded Permit Number:	03-11030
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Perlite Expander
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P010</b>
Company Equipment ID:	Joint Tape Lines 1 and 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P022</b>
Company Equipment ID:	Tube Mill
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P023</b>
Company Equipment ID:	East & West Packers
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P041</b>
Company Equipment ID:	Paint Mixers #2 and #3
Superseded Permit Number:	03-17309
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P043</b>
Company Equipment ID:	Two Sample Saws
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R009</b>
Company Equipment ID:	Inking Station #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Group Name: Kettles**

<b>Emissions Unit ID:</b>	<b>P020</b>
Company Equipment ID:	#3 Kettle
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P021</b>
Company Equipment ID:	#4 Kettle
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Landplaster**

<b>Emissions Unit ID:</b>	<b>P019</b>
Company Equipment ID:	Landplaster Bin
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P036</b>
Company Equipment ID:	Landplaster Packer (12 TPH)
Superseded Permit Number:	03-17050
General Permit Category and Type:	Not Applicable

**Group Name: Mixers**

<b>Emissions Unit ID:</b>	<b>P037</b>
Company Equipment ID:	Ready Mix Line 1
Superseded Permit Number:	03-17309
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P038</b>
Company Equipment ID:	Ready Mix Line 2
Superseded Permit Number:	03-17309
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P039</b>
Company Equipment ID:	Simplex Mixer
Superseded Permit Number:	03-17309
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P040</b>
Company Equipment ID:	#4 Mixer
Superseded Permit Number:	03-17309
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

## **1. Federally Enforceable Standard Terms and Conditions**

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

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **10. Applicability**

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

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

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **B. Facility-Wide Terms and Conditions**

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.

## **C. Emissions Unit Terms and Conditions**

**1. B006, 82 mmBTU/hr Natural Gas Fired Boiler**

**Operations, Property and/or Equipment Description:**

Boiler No. 6

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)	Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 8.04 lb/hr, and 35.22 tons/yr for NO <sub>x</sub>  Carbon monoxide (CO) emissions shall not exceed 6.75 lb/hr, and 29.57 tons/yr  Volatile Organic Compounds (VOC) shall not exceed 0.44 lb/hr and 1.93 tons/yr  Particulate matter less than 10 microns (PM10) shall not exceed 0.61 lb/hr and 2.67 tons/yr [See b)(2)d.]  Sulfur Dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.05 lb/hr and 0.22 ton/yr  Visible PE shall not exceed 5% opacity, as a six-minute average  See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input, See b)(2)c
c.	OAC rule 3745-17-07(A)	See b)(2)d.
d.	40 CFR Part 60, Subpart Dc	Record keeping [see d)(2)].
e.	OAC rule 3745-18-06(G)	See b)(2)e.

- (2) Additional Terms and Conditions
- a. The 8.04 lb NO<sub>x</sub>/hr, 6.75 lb CO/hr, 0.61 lb PM<sub>10</sub>/hr, 0.44 lb VOC/hr, and 0.05 lb SO<sub>2</sub>/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.
  - b. The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of natural gas. BAT requirements also include compliance with the terms and conditions of this permit.
  - c. The potential to emit for particulate emissions from this emissions unit is less than the allowable emission limitation established pursuant to this rule.
  - d. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).
  - e. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).
  - f. All emissions of particulate matter are PM<sub>10</sub>.
- c) Operational Restrictions
- (1) The permittee shall burn only natural gas in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) 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.
  - (2) The permittee shall collect and record the volume (mmft<sup>3</sup>) of natural gas combusted in this emissions unit each calendar month.
- e) Reporting Requirements
- (1) 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.
- f) Testing Requirements
- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
8.04 lb NO<sub>x</sub>/hr, 35.22 tons NO<sub>x</sub> /yr

**Applicable Compliance Method:**

Compliance with the hourly allowable NO<sub>x</sub> limitation may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu. ft/hour) by the AP-42, Table 1.4-1 ( revised 7/98) emission factor for natural gas of 100 lbs NO<sub>x</sub>/mm cu. ft. Compliance with the annual emission limitation may be demonstrated by multiplying the lb NO<sub>x</sub>/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 7.

- b. Emission Limitation(s):  
6.75 lb CO/hr, 29.57 tons/yr

**Applicable Compliance Method:**

Compliance with the hourly allowable CO limitation may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu. ft/hour) by the AP-42, Table 1.4-1 ( revised 7/98) emission factor for natural gas of 84 lbs NO<sub>x</sub>/mm cu. ft. Compliance with the annual emission limitation may be demonstrated by multiplying the lb CO/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 10.

- c. Emission Limitation(s):  
0.020 lb PE/mmBtu of actual heat input  
0.61 lb PM<sub>10</sub>/hr, 2.67 tons/yr

**Applicable Compliance Method:**

Compliance with the hourly allowable PM<sub>10</sub> limitation may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu. ft/hour) by the AP-42, Table 1.4-2 ( revised 7/98) emission factor for natural gas of 7.6 lbs PE/mm cu. ft. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM<sub>10</sub>/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

Compliance with the lb/mmBtu allowable PE limitation may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu. ft/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas of 7.6 lbs PE/mm cu. ft, and then dividing by the maximum heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb PM<sub>10</sub>/hr by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. Emission Limitation:  
0.44 lb VOC/hr, 1.93 tons/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 5.5 lb VOC /mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb VOC/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 18, 25, or 25A.

- e. Emission Limitation:  
0.05 lb SO<sub>2</sub>/hr, 0.22 tons/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 0.6 lb SO<sub>2</sub> /mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb SO<sub>2</sub>/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 6.

- f. Emission Limitation:  
Visible PE shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

g) Miscellaneous Requirements

- (1) This PTI supercedes the requirements of PTI# 03-1203 issued on 12/9/1982 for emissions unit B006.

**2. F005, Paved Roads & Parking Areas**

**Operations, Property and/or Equipment Description:**

Plant Roads and Parking Lots

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)	<p><u>Unpaved roadways and Parking Areas:</u></p> <p>Fugitive particulate matter of 10 microns or less (PM10) shall not exceed 0.44 ton/year,</p> <p>Fugitive particulate emissions (PE) shall not exceed 1.50 tons/year</p> <p>No visible PE except for 3 minutes during any 60-minute period</p> <p>Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (See b)(2)a. through b)(2)f.)</p> <p><u>Paved roadways and Parking Areas:</u></p> <p>Fugitive particulate matter of 10 microns or less (PM10) shall not exceed 1.61 tons/ year,</p> <p>Fugitive particulate emissions (PE) shall not exceed 8.22 tons/year</p> <p>No visible PE except for one minute during any 60-minute period</p> <p>Best available control measures that are sufficient to minimize or eliminate visible</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PE of fugitive dust (See b)(2)a. through b)(2)f.)
b.	OAC rule 3745-17-07(B)(4) and OAC rule 3745-17-07(B)(5)	See b)(2)h.
c.	OAC rule 3745-17-08(B)	See b)(2)i.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved and unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved and unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- c. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- d. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- f. Any unpaved roadway or parking area that is subsequently paved, will require a permit to install modification for paved roadways and parking areas.
- g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- h. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- i. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>roadways and parking areas</u>	<u>minimum inspection frequency</u>
all paved roads and parking areas	daily
all unpaved roads and parking areas	daily

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (3) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify the following:
- 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.

The permittee shall submit these reports in accordance with the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:  
Unpaved roadways and Parking Areas: Fugitive particulate matter of 10 microns or less (PM10) shall not exceed 0.44 ton/ year, fugitive particulate emissions (PE) shall not exceed 1.50 tons/year.

Paved roadways and Parking Areas: Fugitive particulate matter of 10 microns or less (PM10) shall not exceed 1.61 tons/ year, fugitive particulate emissions (PE) shall not exceed 8.22 tons/year.

Applicable Compliance Method:

Compliance may be determined by multiplying the emission factor {for PM10 and PE based on pounds per vehicle mile traveled (VMT)} for paved and unpaved roadways [from equation 1 in Chapter 13.2.1 of AP-42, and from equation 1a in Chapter 13.2.2 of AP-42, Compilation of Air Pollution Emission Factors, Volume I: Stationary Point and Area Sources; Fifth Edition, (11/06)] by the maximum annual VMT.

- b. Emission Limitation:  
no visible PE, except for a period of time not to exceed one minute during any 60-minute observation period for paved roadways and parking areas, and

no visible PE, except for a period of time not to exceed three minutes during any 60-minute observation period for unpaved roadways and parking areas

Applicable Compliance Method:

Compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 22 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)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) This PTI supercedes the requirements of PTI# 03-11030 issued on 12/4/2003 for emissions unit F005.

**3. P003, Perlite Expander**

**Operations, Property and/or Equipment Description:**

Perlite Expander

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Baghouse emissions:  Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 1.46 lb./hr and 6.39 ton/yr.  Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average from the baghouse stacks.  See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)	Natural gas fuel burning emissions:  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 0.20 lb/hr, and 0.88 ton/yr for NO <sub>x</sub>  Carbon monoxide (CO) emissions shall not exceed 0.16 lb/hr, and 0.70 ton/yr  Volatile Organic Compounds (VOC) shall not exceed 0.01 lb/hr and 0.04 ton/yr  See b)(2)b. and b)(2)e.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)(2)	See b)(2)d.
e.	OAC rule 3745-18-06(E)	See b)(2)e.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:

- i. 1.46 lb PM10/hr and 6.39 ton/yr; and
- ii. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average.

All emissions of particulate matter from the baghouse stack are PM10.

b. The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of natural gas. BAT requirements also include compliance with the terms and conditions of this permit.

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

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

e. The potential to emit for SO<sub>2</sub> from this emissions unit is 0.0012 lb/hr and complies with the emission limitation established pursuant to this rule. The potential to emit for SO<sub>2</sub> was determined by multiplying a maximum heat input of 2 mmBtu/hr, an emission factor of 0.6 lb SO<sub>2</sub>/mmscf of natural gas (AP-42, Section 1.4, Table 1.4-2, 7/98) and a heat content of 1020 BTU/scf.

f. All emissions of particulate matter are PM10.

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:

a. All particulates from this emissions unit shall be vented to a baghouse system capable of achieving a maximum outlet concentration of 0.02 grains/dscf of PM10.

(2) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping 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 stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. 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.
- (2) 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.
- e) Reporting Requirements
- (1) The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office by January 31 and July 31 of each year and shall cover the previous 6-month period.
  - (2) 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.
- f) Testing Requirements
- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
1.46 lb. PM<sub>10</sub>/hr, 6.39 ton/yr  
  
Applicable Compliance Method:  
  
The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, by the maximum volumetric air flow rate (8,510 acfm) contributed from this emissions unit to the baghouse, and using the following conversion factors in order to convert to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM<sub>10</sub>/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.  
  
If required, the permittee shall demonstrate compliance with the hourly limit by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
    - b. Emission Limitation:  
0.20 lb NO<sub>x</sub>/hr, 0.88 ton NO<sub>x</sub> /yr

**Applicable Compliance Method:**

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 100 lb NO<sub>x</sub> /mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb NO<sub>x</sub> /hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 7.

- c. **Emission Limitation(s):**  
0.16 lb CO /hr, 0.70 ton/yr

**Applicable Compliance Method:**

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 84 lb CO/mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb CO /hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 10.

- d. **Emission Limitation:**  
0.01 lb OC/hr, 0.04 tons/yr

**Applicable Compliance Method:**

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 5.5 lb OC/mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb OC/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 18, 25, or 25A.

- e. **Emission Limitation:**  
Visible PE shall not exceed 5% opacity, as a 6-minute average from the stacks serving this emissions unit.

**Applicable Compliance Method:**

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

g) Miscellaneous Requirements

(1) None.

**4. P010, Joint Tape Lines 1 and 2**

**Operations, Property and/or Equipment Description:**

Joint Tape Lines 1 and 2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Baghouse emissions:  Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 2.06 lb./hr and 9.02 ton/yr.  Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average from the baghouse stacks.  Non-baghouse emissions:  Fugitive PE shall not exceed 0.90 ton/yr  Visible PE shall not exceed 20% opacity, as a 3-minute average from building egress points.  See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-07(B)	See b)(2)d.
d.	OAC rule 3745-17-08(B)	See b)(2)e.
e.	OAC rule 3745-17-11(B)(2)	See b)(2)f.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable

emission limitations are based on the operational restriction contained in c)(1) which require control equipment:

- i. 2.06 lb PM10/hr and 9.02 ton/yr; and
- ii. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average from the baghouse stacks.

All emissions of particulate matter from the baghouse stacks are PM10.

- b. This permit also establishes a 0.90 ton/yr federally enforceable emission limitation taking into account the use of a baghouse which vents into the building with a maximum outlet concentration of 0.01 gr PM10/dscf and approximately 70 percent control efficiency for the building enclosure.
- c. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(D).
- d. This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- e. This facility is not located within an "Appendix A" area identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- g. All emissions of particulate matter are PM10.

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
  - a. All particulates from this emissions unit shall be vented to a baghouse system capable of achieving a maximum outlet concentration of 0.01 grains/dscf of PM10.

d) Monitoring and/or Recordkeeping 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 stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. 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.

(2) 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 building 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. 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 minimize or eliminate the abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field 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 (a) identify all days during which any visible particulate emissions were observed from building egress points associated with this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation: from the baghouse stacks  
2.06 lb. PM10/hr, 9.02 ton/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.01 gr/dscf, by the maximum volumetric air flow rate (24,000 acfm) contributed from this emissions unit to the baghouse, and using the following conversion factors in order to convert to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual emission limitation may be

demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the hourly limit by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation: from the building  
Fugitive particulate emissions (PE) shall not exceed 0.90 ton/yr

**Applicable Compliance Method:**

The annual limitation was established by multiplying the maximum baghouse outlet concentration of 0.01 gr/dscf, by the maximum volumetric air flow rate (8,000 dscfm) vented into the building from this baghouse, and using the following conversion factors in order to covert to tons per year: 1 lb/7000 grains, 60 minutes/hour, and the approximately 70 percent control efficiency (.30), and multiplying by 8760 hours/year and 1 ton/2000 lbs.

- c. Emission Limitation:  
Visible PE shall not exceed 5% opacity, as a 6-minute average from the stacks serving this emissions unit.

**Applicable Compliance Method:**

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

- d. Emission Limitation:  
Visible PE from the building shall not exceed 20% opacity, as a 3-minute average.

**Applicable Compliance Method:**

If required, compliance with the visible emission limitation listed above shall be determined according to Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources." As such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) This PTI supercedes the requirements of PTI# 03-13301 issued on 6/21/2000 for emissions unit P010.

**5. P022, Tube Mill**

**Operations, Property and/or Equipment Description:**

Tube Mill

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.22 lb./hr and 0.98 ton/yr.  Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average from the baghouse stack.  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(2)	See b)(2)c.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:

- i. 0.22 lb PM10/hr and 0.98 ton/yr; and
- ii. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average.

All emissions of particulate matter from the baghouse stack are PM10.

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

- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- d. All emissions of particulate matter are PM10.

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
  - a. All particulates from this emissions unit shall be vented to a baghouse system capable of achieving a maximum outlet concentration of 0.01 grains/dscf of PM10.

d) Monitoring and/or Recordkeeping 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 serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. 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.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:
  - a. Emission Limitation: from the baghouse stacks  
0.22 lb. PM10/hr, 0.98 ton/yr

Applicable Compliance Method: The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.01 gr/dscf, by the maximum volumetric air flow rate (2,607 acfm) contributed from this emissions unit to the baghouse, and using the following conversion factors in order to convert

to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the hourly limit by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation:  
Visible PE shall not exceed 5% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

- g) Miscellaneous Requirements

- (1) None.

**6. P023, East & West Packers**

**Operations, Property and/or Equipment Description:**

East and West Packers

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 1.25 lbs./hr and 5.48 tons/yr.  Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average from the baghouse stacks.  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(2)	See b)(2)c.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:

- i. 1.25 lbs PM10/hr and 5.48 tons/yr; and
- ii. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average.

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

- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- d. All emissions of particulate matter are PM10.

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
  - a. All particulates from this emissions unit shall be vented to a baghouse system capable of achieving a maximum outlet concentration of 0.02 grains/dscf of PM10.

d) Monitoring and/or Recordkeeping 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 stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. 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.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:
  - a. Emission Limitation: from the baghouse stacks  
1.25 lbs. PM10/hr, 5.48 tons/yr

Applicable Compliance Method: The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf by, the maximum volumetric air flow rate (7,300 acfm) contributed from this emissions unit to the baghouses, and using the following conversion factors in order to

covert to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the hourly limit by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation:  
Visible PE shall not exceed 5% opacity, as a 6-minute average from the stacks serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

- g) Miscellaneous Requirements

- (1) None.

**7. P041, Paint Mixers #2 and #3**

**Operations, Property and/or Equipment Description:**

Paint Mixers No. 2 and 3

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Non-baghouse emissions:  Fugitive particulate emissions (PE) shall not exceed 1.57 tons per rolling, 12-month period  Visible PE shall not exceed 20% opacity, as a 3-minute average from building egress points.  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)	Volatile Organic Compounds (VOC) shall not exceed 2.45 lb/hr and 10.73 tons/yr  See b)(2)b.
	OAC rule 3745-17-07(A)	See b)(2)c.
	OAC rule 3745-17-07(B)	See b)(2)d.
	OAC rule 3745-17-08(B)	See b)(2)e.
	OAC rule 3745-17-11(B)(2)	See b)(2)f.
	OAC rule 3745-21-07(G)(2)	None [See b)(g)]

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:

- i. 1.57 ton of PE per rolling, 12-month period; and
    - ii. Visible particulate emissions shall not exceed 20% opacity, as a six-minute average from building egress points.
  - b. The emission limitations of 2.45 lbs of VOC/hr and 10.73 tons per year were established to reflect the potential to emit for this emissions unit. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with these limitations.
  - c. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(D).
  - d. This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
  - e. This facility is not located within an "Appendix A" area identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
  - f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
  - g. OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in [employing, applying, evaporating or drying] photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- c) Operational Restrictions
  - (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
    - a. Ninety-nine percent of all particulates from this emissions unit are captured and shall be vented to a baghouse system capable of achieving a maximum outlet concentration of 0.02 grains/dscf of PE and approximately 70 percent control efficiency for the building enclosure.
- d) Monitoring and/or Recordkeeping 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 building 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. 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 minimize or eliminate the abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from building egress points associated with this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation: from the building  
1.57 tons PE per rolling, 12-month period

Applicable Compliance Method:

The annual limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, by the maximum volumetric air flow rate (2,500 dscfm) vented into the building from this baghouse, and using the following conversion factors in order to convert to tons per year: 1 lb/7000 grains, 60 minutes/hour, and the approximately 70 percent control efficiency (.30), and multiplying by 8760 hours/year and 1 ton/2000 lbs, and add this result to the product of multiplying the AP-42 Table 6.4-1 (dated 5/83) emission factor of 20 lbs/ 2000 lbs of solids material mixed by the maximum amount of coating solids of 12.77 lbs of solids/gal, and a maximum production rate of 600 gal/hr, and the 99 percent capture efficiency (0.01), and the approximately 70 percent control efficiency (.30), and multiplying by 8760 hours/year and 1 ton/2000 lbs.

- b. Emission Limitation:  
2.45 lbs VOC/hr, 10.73 tons/yr

Applicable Compliance Method:

The hourly and annual emission limitations represent the potential to emit\* of the emissions unit. Therefore, no record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, compliance with the VOC emission limitation shall be determined in accordance with the test methods and procedures in Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

\* The potential to emit for this emissions unit is based on multiplying the AP-42 5.2-4 (dated 1/95) loading emission factor of 4.08 lb VOC/1000 gallon by the maximum production rate of 600 gallons per hour. The annual potential to emit is based on the hourly potential to emit and a maximum operating schedule of 8760 hrs/yr.

- c. Emission Limitation:  
Visible PE from the building shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation listed above shall be determined according to Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources." As such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) This PTI supercedes the requirements of PTI# 03-17309 issued on 5/29/2008 for emissions unit P041.

**8. P043, Two Sample Saws**

**Operations, Property and/or Equipment Description:**

Two Sample Saws

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.41 lb./hr and 1.8 tons/yr.  Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average from the baghouse stack.  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
	OAC rule 3745-17-11(B)(2)	See b)(2)c.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:

i. 0.41 lb PM10/hr and 1.8 tons/yr; and

ii. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average from the baghouse stacks.

All emissions of particulate matter from the baghouse stacks are PM10.

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

- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- d. All emissions of particulate matter are PM10.

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
  - a. All particulates from this emissions unit shall be vented to a baghouse system capable of achieving a maximum outlet concentration of 0.02 grains/dscf of PM10.

d) Monitoring and/or Recordkeeping 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 serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. 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.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:
  - a. Emission Limitation: from the baghouse stack  
0.41 lb. PM10/hr, 1.8 tons/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, by the maximum volumetric air

flow rate (2,400 acfm) contributed from this emissions unit to the baghouses, and using the following conversion factors in order to covert to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation:  
Visible PE shall not exceed 5% opacity, as a 6-minute average from the stack serving this emissions unit.

**Applicable Compliance Method:**

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

- g) Miscellaneous Requirements

- (1) None.

**9. Emissions Unit Group Inking Stations: ~~R008, R009, GFP Green Inking Station~~**

EU-ID	Operations, Property and/or Equipment Description
R008	<del>GFP Blue Inking Station (Z625)</del>
R009	<del>GFP Green Inking Station</del>

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)	<del>R008:</del> Volatile organic compounds (VOC) shall not exceed 0.94 lb/hr and 4.12 tons/yr from coatings  <del>R009:</del> Volatile organic compounds (VOC) shall not exceed 0.11 lb/hr and 0.48 tons/yr from coatings  <del>R008 and R009:</del> VOC emissions shall not exceed 8 lbs /month and 0.048 ton/yr from cleanup materials for each inking station  See b)(2)a.
b.	OAC rule 3745-21-07(G)	See b)(2)b.

(2) Additional Terms and Conditions

a. The emissions from ~~this/these~~ sources are not vented to a dedicated stack. The emissions are released into the building and egress the building through general ventilation openings.

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the

U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: c)(1), d)(1)b. and e)(3).

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: none.

c) Operational Restrictions

- (1) The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for coating usage in this ~~each of these~~ emissions units:
  - a. The company identification for each coating employed.
  - b. The determination of whether or not the coating is a photochemically reactive material.
  - c. The number of gallons of each coating employed.
  - d. The VOC content of each coating employed, in pounds/gallon.
  - e. The VOC input rate for each coating employed, in pounds [d)(1)c. x d)(1)d.].
  - f. The total VOC input rate for all the coatings employed, in pounds [summation of d)(1)e. for all coatings].
  - g. The annual year to date VOC for all the coatings employed, in tons [summation of d)(1)f. for each month to date from January to December].
- (2) The permittee shall collect and record the following information each month for cleanup material usage in this ~~each of these~~ emissions units:
  - a. The company identification for each cleanup material employed.
  - b. The determination of whether or not the cleanup material is a photochemically reactive material.
  - c. The number of gallons of each cleanup material employed.

- d. The VOC content of each cleanup material employed, in pounds/gallon.
- e. The VOC input rate for each cleanup material employed, in pounds [d)(2)c. x d)(2)d.].
- f. The total VOC input rate for all cleanup materials employed, in pounds [summation of d)(2)e. for all cleanup materials].
- g. The annual year to date VOC for all clean-up materials employed, in tons [summation of d)(2)f. for each month to date from January to December].

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the monthly VOC emission limitation (from cleanup materials ~~for each inking station~~) exceeded 8 pounds.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit annual reports with identify any exceedance of the annual VOC limits for the ~~each~~ inking station, as well as corrective actions that were taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (3) The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any noncomplying coating or cleanup material (i.e., photochemically reactive material) in these emission units. The notification shall include a copy of such record and shall be sent to the Director (appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations established in section b)(1) of this permit shall be determined in accordance with the following methods:

~~a. Emission Limitation(s):  
0.94 lb VOC/hr, 4.12 tons/yr, for R008~~

~~Applicable Compliance Method:~~

~~The hourly allowable VOC emission limitation was established by multiplying the maximum VOC content of 7.21 lb OC/gallon by the maximum coating application rate of 0.13 gallons/hr.~~

~~The tons/yr limitations were developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton.~~

~~Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.~~

~~If required, the hourly allowable VOC emission limitations shall be determined in accordance with Methods 1 – 4 and 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A.~~

- a. Emission Limitation(s):  
0.11 lb VOC/hr, 0.48 ton/yr, ~~for R009~~

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the maximum VOC content of 7.21 lb VOC/gallon by the maximum coating application rate of 0.015 gallons/hr.

The tons/yr limitations were developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be demonstrated with the annual limitation.

~~If required, the hourly allowable VOC emission limitations shall be determined in accordance with Methods 1 – 4 and 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A.~~

- b. Emission Limitation(s):  
8 lbs OC/month, 0.048 ton VOC/yr; from cleanup materials, ~~for R008 and R009~~

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(2) of the terms and conditions of this permit.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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 PTI 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 PTI.

**10. Emissions Unit Group -Kettles: P020, P021,**

EU ID	Operations, Property and/or Equipment Description
P020	No. 3 Kettle
P021	No. 4 Kettle

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p><u>P020:</u>            Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.34 lb./hr and 1.5 tons/yr.</p> <p>Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average from the baghouse stack.</p> <p>See b)(2)a. and b)(2)f.</p> <p><u>P021:</u>            Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.51 lb./hr and 2.25 tons/yr.</p> <p>Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average from the baghouse stack.</p> <p>See b)(2)a. and b)(2)f.</p>
b.	OAC rule 3745-31-05(A)(3)(a)	<p><u>P020 and P021</u> - Natural gas fuel burning emissions from each emissions unit:</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 1.37 lb/hr, and 6.00 tons/yr for NO<sub>x</sub></p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Carbon monoxide (CO) emissions shall not exceed 1.15 lb/hr, and 5.04 tons/yr  PM10 emissions shall not exceed 0.10 lb/hr and 0.44 ton/yr  Volatile Organic Compounds (VOC) shall not exceed 0.08 lb/hr and 0.35 ton/yr  Sulfur Dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.01 lb/hr and 0.04 ton/yr
	OAC rule 3745-17-07(A)	See b)(2)b.
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input, See b)(2)c.
	OAC rule 3745-17-11(B)(2)	See b)(2)d.
	OAC rule 3745-18-06(E)	See b)(2)e.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:
  - i. 0.34 lb PM10/hr and 1.5 tons/yr from P020; and 0.51 lb PM10/hr and 2.25 tons/yr from P021; and
  - ii. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average from each of the baghouse stacks.

All emissions of particulate matter from the baghouse stacks are PM10.
- b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(D).
- c. The potential to emit for particulate emissions from this emissions unit is less than the allowable emission limitation established pursuant to this rule.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- e. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).
- f. All emissions of particulate matter are PM10.

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
  - a. All particulates from this emissions unit shall be vented to a baghouse system capable of achieving a maximum outlet concentration of 0.02 grains/dscf of PM10.
- (2) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping 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 stacks serving these emission units. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. 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.
- (2) 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 these emission units.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving these emission units and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in these emission units. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:
  - a. Emission Limitation: for P020  
0.34 lbs. PM10/hr, 1.5 tons/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf by the maximum adjusted volumetric air flow rate at standard temperature (2,000 scfm) contributed from this emissions unit to the baghouses, and using the following conversion factors in order to convert to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation: for P021  
0.51 lb. PM10/hr, 2.25 tons/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, by the maximum adjusted volumetric air flow rate at standard temperature (3,000 scfm) contributed from this emissions unit to the baghouses, and using the following conversion factors in order to convert to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation:  
1.37 lb NO<sub>x</sub>/hr, 6.00 tons NO<sub>x</sub> /yr, for P020 and P021 each

Applicable Compliance Method:

Compliance with the hourly allowable NO<sub>x</sub> limitation may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu. ft/hour) by the AP-42, Table 1.4-1 ( revised 7/98) emission factor for natural gas of 100 lbs NO<sub>x</sub>/mm cu. ft. Compliance with the annual emission limitation may be demonstrated by multiplying the lb NO<sub>x</sub>/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 7.

- d. Emission Limitation(s):  
1.15 lb CO/hr, 5.04 tons/yr, for P020 and P021 each

**Applicable Compliance Method:**

Compliance with the hourly allowable CO limitation may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu. ft./hour) by the AP-42, Table 1.4-1 ( revised 7/98) emission factor for natural gas of 84 lbs NOx/mm cu. ft. Compliance with the annual emission limitation may be demonstrated by multiplying the lb CO/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 10.

- e. **Emission Limitation(s):**  
0.020 lb PE/mmBtu of actual heat input, for P020 and P021 each  
0.10 lb PM10/hr, 0.44 tons/yr, for P020 and P021 each

**Applicable Compliance Method:**

Compliance with the hourly allowable PM10 limitation may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu. ft./hour) by the AP-42, Table 1.4-2 ( revised 7/98) emission factor for natural gas of 7.6 lbs PE/mm cu. ft. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

Compliance with the lb/mmBtu allowable PE limitation may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu. ft./hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas of 7.6 lbs PE/mm cu. ft, and then dividing by the maximum heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb PM10/hr by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- f. **Emission Limitation:**  
0.08 lb VOC/hr, 0.35 ton/yr, for P020 and P021 each

**Applicable Compliance Method:**

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 5.5 lb VOC /mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb VOC/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 18, 25, or 25A.

- g. Emission Limitation:  
0.01 lb SO<sub>2</sub>/hr, 0.04 tons/yr, for P020 and P021 each

Applicable Compliance Method:

Compliance with the emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 0.6 lb SO<sub>2</sub> /mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb SO<sub>2</sub>/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 6.

- h. Emission Limitation: for P020 and P021 each  
Visible PE shall not exceed 5% opacity, as a 6-minute average from the stacks serving these emission units.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

g) Miscellaneous Requirements

- (1) None.

**11. Emissions Unit Group -Landplaster: P019, P036,**

EU ID	Operations, Property and/or Equipment Description
P019	Landplaster Tanks
P036	Landplaster Packer

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 1.03 lb./hr and 4.51 tons/yr. (combined emissions for P019 and P036)  Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average from the shared baghouse stack.  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
	OAC rule 3745-17-11(B)(2)	See b)(2)c.

- (2) Additional Terms and Conditions
- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:
- i. 1.03 lbs PM10/hr and 4.51 tons/yr (combined emissions for P019 and P036; and
  - ii. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average from the shared baghouse stack.

All emissions of particulate matter from the baghouse stacks are PM10.

- b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(D).
  - c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
  - d. All emissions of particulate matter are PM10.
- c) Operational Restrictions
- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
    - a. All particulates from these emission units shall be vented to a baghouse system capable of achieving a maximum outlet concentration of 0.02 grains/dscf of PM10.
- d) Monitoring and/or Recordkeeping 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 serving these emission units. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. 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.
- e) Reporting Requirements
- (1) The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving these emission units and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- f) Testing Requirements
- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:
    - a. Emission Limitation: combined limit for P019 and P036, from the baghouse stack 1.03 lbs PM10/hr and 4.51 tons/yr (combined emissions for P019 and P036)

**Applicable Compliance Method:**

The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, by the maximum volumetric air flow rate (6,000 acfm) contributed from these emission units to the baghouse, and using the following conversion factors in order to covert to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

b. **Emission Limitation:**

Visible PE shall not exceed 5% opacity, as a 6-minute average from the stack serving these emission units.

**Applicable Compliance Method:**

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

g) **Miscellaneous Requirements**

- (1) This PTI supercedes the requirements of PTI# 03-17050 issued on 3/16/2006 for emissions unit P036.

**12. Emissions Unit Group -Mixers: P037, P038, P039, P040.**

EU ID	Operations, Property and/or Equipment Description
P037	Ready Mix Line No. 1
P038	Ready Mix Line No. 2
P039	Simplex Mixer
P040	No. 4 Mixer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p><u>P037:</u> Baghouse emissions:            Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.82 lb./hr and 3.6 tons/yr.</p> <p>Non-baghouse emissions:</p> <p>Fugitive particulate emissions (PE) shall not exceed 0.64 ton per rolling, 12-month period</p> <p><u>P038:</u> Baghouse Emissions:            Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.17 lb./hr and 0.75 ton/yr.</p> <p>Non-baghouse emissions:</p> <p>Fugitive PE shall not exceed 0.66 tons per rolling, 12-month period</p> <p><u>P039:</u> Non-baghouse emissions:            Fugitive PE shall not exceed 0.18 ton per rolling, 12-month period</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>P040:</u> Baghouse emissions:            Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.75 lb./hr and 3.3 tons/yr.</p> <p>Non-baghouse emissions:</p> <p>Fugitive PE shall not exceed 0.02 ton per rolling, 12-month period</p> <p><u>P037, P038 and P040:</u>            Visible PE shall not exceed 5% opacity, as a six-minute average from the baghouse stacks.</p> <p><u>P037 through P040:</u>            Visible PE shall not exceed 20% opacity, as a 3-minute average from building egress points.</p> <p>See b)(2)a. and b)(2)b.</p>
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-07(B)	See b)(2)d.
d.	OAC rule 3745-17-08(B)	See b)(2)e.
e.	OAC rule 3745-17-11(B)(2)	See b)(2)f.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable PM10 emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:
  - i. 0.82 lb PM10/hr and 3.6 ton/yr for P037; 0.17 lb PM10/hr and 0.75 ton/yr for P038, 0.76 lb PM10/hr and 3.3 ton/yr for P040: and
  - ii. Visible particulate emissions shall not exceed 5% opacity, as a six-minute average for stack emissions from P037, P038, and P040..

All emissions of particulate matter from these baghouse stacks are PM10.
- b. This permit also establishes federally enforceable PE limitations for the purpose of limiting potential to emit (PTE). This permit establishes a 0.64 ton for P037, 0.66 ton for P038, 0.18 ton for P039 and 0.02 ton for P040 of PE per rolling, 12-month period federally enforceable emission limitation for the material handling portions of these emission units.

- c. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(D).
- d. This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- e. This facility is not located within an "Appendix A" area identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:
  - a. All particulates from these emission units shall be vented to a baghouse system capable of achieving a maximum outlet concentration of 0.02 grains/dscf of PM10.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emission units are in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving emission units P037, P038 and P040. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. 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.
- (2) The permittee shall perform daily checks, when these emission units are in operation and when the weather conditions allow, for any visible particulate emissions from building egress points (i.e., building windows, doors, roof monitors, etc.) serving these emission units P037 through P040. 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. 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 minimize or eliminate the abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stacks serving emission units P037, P038 and P040 and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field 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 (a) identify all days during which any visible particulate emissions were observed from building egress points associated with emission units P037 through P040 and (b) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation: from the baghouse stacks for P037  
0.82 lb. PM10/hr, 3.6 tons/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf by the maximum volumetric air flow rate (4,800 acfm) contributed from this emissions unit to the baghouses, and using the following conversion factors in order to covert to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation: from the baghouse stack for P038  
0.17 lb. PM10/hr, 0.75 tons/yr

Applicable Compliance Method: The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, by the maximum volumetric air flow rate (1,000 acfm) contributed from this emissions unit to the baghouses, and using the following conversion factors in order to covert to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual

emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation: from the baghouse stack for P040  
0.75 lb. PM10/hr, 3.3 tons/yr

Applicable Compliance Method: The hourly emission limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, by the maximum volumetric air flow rate (4,400 acfm) contributed from this emissions unit to the baghouses, and using the following conversion factors in order to convert to lbs/hr: 1 lb/7000 grains, 60 minutes/hour. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. Emission Limitation: from the building for P037  
0.64 ton PE per rolling, 12-month period

Applicable Compliance Method: The annual limitation was established by multiplying the AP-42 Table 11.17-4 emission factor of 2.2 lbs/ton of material processed by the maximum production rate of 22 tons/hr and the 99 percent capture efficiency (0.01), and the approximately 70 percent control efficiency (.30), and multiplying by 8760 hours/year and 1 ton/2000 lbs.

- e. Emission Limitation: from the building for P038  
0.66 ton PE per rolling, 12-month period

Applicable Compliance Method: The annual limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, by the maximum volumetric air flow rate (600 dscfm) vented into the building from this baghouse, and using the following conversion factors in order to convert to tons per year: 1 lb/7000 grains, 60 minutes/hour, and the approximately 70 percent control efficiency (.30), and multiplying by 8760 hours/year and 1 ton/2000 lbs, and add this result to the product of multiplying the AP-42 Table 11.17-4 emission factor of 2.2 lbs/ton of material processed by the maximum production rate of 18 tons/hr. and the 99 percent capture efficiency (0.01), and the approximately 70 percent control efficiency (.30), and multiplying by 8760 hours/year and 1 ton/2000 lbs.

- f. Emission Limitation: from the building for P039  
0.18 ton PE per rolling, 12-month period

**Applicable Compliance Method:**

The annual limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, by the maximum volumetric air flow rate (588 dscfm) vented into the building from this baghouse, and using the following conversion factors in order to covert to tons per year: 1 lb/7000 grains, 60 minutes/hour, and the approximately 70 percent control efficiency (.30), and multiplying by 8760 hours/year and 1 ton/2000 lbs, and add this result to the product of multiplying the AP-42 Table 11.17-4 emission factor of 2.2 lbs/ton of material processed by the maximum production rate of 1.66 tons/hr. and the 99 percent capture efficiency (0.01), and the approximately 70 percent control efficiency (.30), and multiplying by 8760 hours/year and 1 ton/2000 lbs.

- g. Emission Limitation: from the building for P040  
0.02 ton PE per rolling, 12-month period

**Applicable Compliance Method:**

The annual limitation was established by multiplying the AP-42 Table 11.17-4 emission factor of 2.2 lbs/ton of material processed by the maximum production rate of 0.71 ton/hr and the 99 percent capture efficiency (0.01), and the approximately 70 percent control efficiency (.30), and multiplying by 8760 hours/year and 1 ton/2000 lbs.

- h. Emission Limitation: for each of the following baghouses - P037, P038, and P040:  
Visible PE shall not exceed 5% opacity, as a 6-minute average from the stacks serving these emission units.

**Applicable Compliance Method:**

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

- i. Emission Limitation: for each of the following non-baghouse sources - P037 through P040:  
Visible PE from the building shall not exceed 20% opacity, as a 3-minute average.

**Applicable Compliance Method:**

If required, compliance with the visible emission limitation listed above shall be determined according to Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources." As such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) This PTI supercedes the requirements of PTI# 03-17309 issued on 5/29/2008 for emission units P037 through P040.