☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **#02-19718**

A. Source Description

Morton Salt of Rittman, Ohio is an existing salt manufacturer. Morton is a Title V company, and due to particulate emissions is major for PSD. The modification of these 2 lines will exceed the PM-10 significance threshold for PSD, so they are pursuing a synthetic minor to avoid PSD permitting.

B. Facility Emissions and Attainment Status

The difference between the proposed potential and the current actual emissions for this project is 44.71 tons per year, which is greater than the threshold of 15 tons per year. This synthetic minor permit will limit the PE difference to 13.18 tons per year. Wayne County is currently designated as attainment for particulate.

C. Source Emissions

The salt pellet lines consist of elevators, screens, conveyors, crushers, presses and bins. They are vented to 2 scrubbers, and the bins are vented to a baghouse. The outlet emissions of the control devices will be determined during a stack test.

D. Conclusion

Morton's control device changes on P013 and P014 will cause particulate emissions to be limited to 22.96 tons per year. The difference between Allowable Emissions and the current Actual Emissions for this project is 13.18 tons per year, which is less than the PSD Major Modification threshold of 15 tons per year. The facility will remain below the PSD significance level.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
WAYNE COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 02-19718
Fac ID: 0285020059

DATE: 8/24/2004

Morton International; Rittman Facility
John Esmont
151 S. Industrial St
Rittman, OH 44270

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$2500** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NEDO**

WAYNE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-19718** FOR AN AIR CONTAMINANT SOURCE FOR
Morton International; Rittman Facility

On 8/24/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Morton International; Rittman Facility**, located at **151 S. Industrial St, Rittman**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-19718:

Synthetic minor Permit to Install to change control equipment that will result increased allowable emissions.

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

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

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install | **Issue Date: To be entered upon final issuance**
Terms and Conditions | **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-19718

Application Number:	02-19718
Facility ID:	0285020059
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Morton International; Rittman Facility
Person to Contact:	John Esmont
Address:	151 S. Industrial St Rittman, OH 44270

Location of proposed air contaminant source(s) [emissions unit(s)]:
151 S. Industrial St
Rittman, Ohio

Description of proposed emissions unit(s):
Synthetic minor Permit to Install to change control equipment that will result increased allowable emissions.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.

iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, 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, reopening 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.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit

shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

b. 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:

i. 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.

ii. 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.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

10. Permit To Operate Application

a. If 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).

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

11. Best Available Technology

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

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

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

6. 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.

7. 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).

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
PE	22.96

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Emissions Unit ID: P013

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P013 - Fourth floor pellet system controlled by a Tri-Mer wet scrubber (South Pellet Scrubber). Modified. Terms in this permit supercede those identified in PTI 02-1571 issued 10/8/97.	OAC rule 3745-31-05(A)(3)	See Sections A.I.2.a, A.I.2.b, and A.I.2.c below.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart OOO	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	See Section A.I.2.d below.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid PSD	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See Section A.I.2.f below.
	40 CFR Part 64	See Section A.I.2.e below.

2. Additional Terms and Conditions

2.a Particulate emissions shall not exceed 0.0114 grains/dscf, 2.28 lbs/hr and PM-10 emissions shall not exceed 0.0114 grains/dscf, 2.28 lbs/hr from the wet scrubber exhaust.

2.b Particulate emissions from the fourth floor pellet system elevators, screens, conveyors, crushers, and bins shall all be vented to a control device.

2.c Stack visible emissions from the wet scrubber shall not exceed 0% opacity, as a six-minute average.

2.d This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.

2.e This emissions unit's potential pre-control device emissions of a regulated air pollutant is greater than 100 tons per year. Thus this emissions unit is subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). The facility will be required to submit a CAM plan for the control device serving this emissions unit with either the Title V operating permit renewal application or with the first Significant Modification of the Title V operating permit application, which ever comes first.

2.f PM-10 emissions shall not exceed 9.99 tons as a rolling, 12-month summation and particulate emissions shall not exceed 9.99 tons as a rolling, 12-month summation from the wet scrubber exhaust.

II. Operational Restrictions

1. While the emissions unit is in operation, the pressure differential across the wet scrubber shall be maintained within ±30 percent of the average determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate.

2. The frequency of changing the scrubber water shall not be less than the rate determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate.

3. The dust collector shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the wet scrubber while the emissions unit is in operation. The monitoring device shall be certified by the manufacturer to be accurate within ± 1 inch water gauge pressure and shall be calibrated on an annual basis in accordance with manufacturer's instructions. The monitoring device shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

2. The permittee shall collect and record the following information each day:

   a. the differential air pressure across the wet scrubber, on a daily basis; and

   b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

   The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

3. The permittee shall maintain records that document the time interval between the scrubber water changes.

4. 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. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the color of the emissions;
   b. the total duration of any visible emission incident; and
   c. any corrective actions taken to eliminate the visible emissions.

   For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when emissions unit is in operation). If a subsequent check indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emissions point until such time as there are 30 consecutive operating days of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which:

a. the pressure drop across the wet scrubber did not comply with the allowable range specified above; and,

b. the frequency of changing the scrubber water did not comply with the requirements of Section II.2.

2. The permittee shall submit semiannual written reports which (a) identify 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 Director (Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. In accordance with 40 CFR Part 60, Subpart OOO, Section 60.676, the permittee shall submit the following information when existing pieces of equipment are replaced:

a. for a crusher, grinding mill, bucket elevator, or bagging operation, the rated capacity in tons per hour of the existing facility being replaced and the rated capacity in tons per hour of the replacement equipment; or

b. for a screening operation, the total surface area of the top screen of the existing screening operation being replaced and the total surface area of the top screen of the replacement screening operation; or

c. for a conveyor belt, the width of the existing belt being replaced and the width of the replacement conveyor belt; or

d. for a storage bin, the rated capacity in tons of the existing storage bin being replaced and the rated capacity in tons of replacement storage bins.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:
Visible particulate emissions not to exceed 0% opacity as a six-minute average.

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

b. Emission Limitation:
Particulate emissions shall not exceed 0.0114 grains/dscf, 2.28 lbs/hr and 9.99 tons as a rolling, 12-month summation from the wet scrubber exhaust.

Applicable Compliance Method:
Compliance with the short term emission limitations shall be determined through stack testing performed according to the requirements of Sections V.2 through V.5.

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

E = (Operating gr/dscf)(60 min/hr)(Operating hrs/yr)(lb/7000 gr)(ton/2000 lbs)(23,268 dscfm)

where:
E= the particulate emissions from the wet scrubber, in tons per year;
Operating gr/dscf = 0.0114 gr/dscf, or the grain loading determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate;
Operating hrs/yr = 8760 hrs/yr, or the actual hours of operation recorded in Section III.2.b above; and
23,268 dscfm = maximum air flow from the wet scrubber.

c. Emission Limitation:
PM-10 emissions shall not exceed 0.0114 grains/dscf, 2.28 lbs/hr and 9.99 tons as a rolling, 12-month summation from the wet scrubber exhaust.

Applicable Compliance Method:
Same as Section V.1.b above.

2. The facility shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months of the complete modification of this emissions unit.

b. The emissions testing shall be conducted to demonstrate compliance with the applicable emissions limitation of 0.0114 grain per dry standard cubic foot of exhaust.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and Method 5 of 40 CFR Part 60, Appendix A and the modifications required by 40 CFR Part 60 Subpart OOO, Sections 60.675(b), (f) and (g). Alternative U.S. EPA approved test methods may be used with prior written approval from the appropriate Ohio EPA District Office or local air agency.

d. The test(s) shall be conducted under maximum production rates unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

4. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

5. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P013 - Fourth floor pellet system controlled by a Tri-Mer wet scrubber (South Pellet Scrubber). Modified. Terms in this permit supercede those identified in PTI 02-1571 issued 10/8/97.		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	40 CFR Part 64
P014 - Second floor pellet system controlled by a Tri-Mer wet scrubber (North Pellet scrubber) and MAC baghouse in parallel. Modified.	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)(1)	
Terms in this permit supercede those identified in PTI 02-2713 issued 4/14/99.	40 CFR Part 60, Subpart OOO	
	OAC rule 3745-17-11(B)	
	OAC rule 3745-17-08(B)	
	OAC rule 3745-31-05(C) Synthetic Minor to avoid PSD	

Applicable Emissions Limitations/Control Measures
See Sections A.I.2.a, A.I.2.b, A.I.2.c and A.I.2.d below.
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
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The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
See Section A.I.2.e below.
The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
See Section A.I.2.g below.
See Section A.I.2.f below.

2. Additional Terms and Conditions

2.a Particulate emissions shall not exceed 0.0114 grains/dscf and 2.28 lbs/hr from the wet scrubber exhaust. Particulate emissions shall not exceed 0.0041 grains/dscf and 0.68 lb/hr from the baghouse exhaust. Particulate emissions shall not exceed 12.97 tons as a rolling, 12-month summation from both control devices. PM-10 emissions shall not exceed 0.0114 grains/dscf and 2.28 lbs/hr from the wet scrubber exhaust. PM-10 emissions shall not exceed 0.0041 grains/dscf and 0.68 lb/hr from the baghouse exhaust.

2.b Particulate emissions from the second floor pellet system elevators, screens, conveyors, crushers, and bins shall all be vented to a control device.

2.c Stack visible emissions from the wet scrubber shall not exceed 0% opacity, as a six-minute average.

2.d Stack visible emissions from the baghouse shall not exceed 7% opacity, as a six-minute average.

2.e This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.

2.f This emissions unit's potential pre-control device emissions of a regulated air pollutant is greater than 100 tons per year. Thus this emissions unit is subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). The facility will be required to submit a CAM plan for the control device serving this emissions unit with either the Title V operating permit renewal application or with the first Significant Modification of the Title V operating permit application, which ever comes first.

2.g PM-10 emissions shall not exceed 12.97 tons as a rolling, 12-month summation and particulate emissions shall not exceed 12.97 tons as a rolling, 12-month summation from both control devices

II. Operational Restrictions

1. While the emissions unit is in operation, the pressure differential across the wet scrubber shall be maintained within ±30 percent of the average determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate.

2. The frequency of changing the scrubber water shall not be less than the rate determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate.

3. The dust collectors shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.

4. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation, or the range determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the wet scrubber while the emissions unit is in operation. The monitoring device shall be certified by the manufacturer to be accurate within ± 1 inch water gauge pressure and shall be calibrated on an annual basis in accordance with manufacturer's instructions. The monitoring device shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

2. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the baghouse while the emissions unit is in operation. The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

3. The permittee shall collect and record the following information each day:

   a. the differential air pressure across the wet scrubber, on a daily basis;

   b. the differential air pressure across the baghouse, on a daily basis; and

   c. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

   The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

4. The permittee shall maintain records that document the time interval between the scrubber water changes.

5. 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. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the color of the emissions;

b. the total duration of any visible emission incident; and
c. any corrective actions taken to eliminate the visible emissions.

For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may

be reduced to weekly (once per week, when emissions unit is in operation). If a subsequent check indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emissions point until such time as there are 30 consecutive operating days of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which:

   a. the pressure drop across the wet scrubber did not comply with the allowable range specified above;

   b. the frequency of changing the scrubber water did not comply with the requirements of Section II.2; and

   c. the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the 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 Director (Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. In accordance with 40 CFR Part 60, Subpart OOO, Section 60.676, the permittee shall submit the following information when existing pieces of equipment are replaced:

   a. for a crusher, grinding mill, bucket elevator, or bagging operation, the rated capacity in tons per hour of the existing facility being replaced and the rated capacity in tons per hour of the replacement equipment; or

   b. for a screening operation, the total surface area of the top screen of the existing screening operation being replaced and the total surface area of the top screen of the replacement screening operation; or

   c. for a conveyor belt, the width of the existing belt being replaced and the width of the replacement conveyor belt; or

   d. for a storage bin, the rated capacity in tons of the existing storage bin being replaced and the rated capacity in tons of replacement storage bins.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation:
   Stack visible emissions from the wet scrubber shall not exceed 0% opacity, as a six-minute average.

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

   b. Emission Limitation:
   Stack visible emissions from the baghouse shall not exceed 7% opacity, as a six-minute average.

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

   c. Emission Limitation:
   Particulate emissions shall not exceed 0.0114 grains/dscf and 2.28 lbs/hr from the wet scrubber exhaust. Particulate emissions shall not exceed 0.0041 grains/dscf and 0.68 lb/hr from the baghouse exhaust. Particulate emissions shall not exceed 12.97 tons as a rolling, 12-month summation from both control devices.

   Applicable Compliance Method:
   Compliance with the short term emission limitations shall be determined through stack testing performed according to the requirements of Sections V.2 through V.5.

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

   Es = (Operating gr/dscf)(60 min/hr)(Operating hrs/yr)(lb/7000 gr)(ton/2000 lbs)(23,268 dscfm)

   where:
   Es= the particulate emissions from the wet scrubber, in tons per year;
   Operating gr/dscf = 0.0114 gr/dscf, or the grain loading determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate;
   Operating hrs/yr = 8760 hrs/yr, or the actual hours of operation recorded in Section III.3.c above; and
   23,268 dscfm = maximum air flow from the wet scrubber.

Eb = (Operating gr/dscf)(60 min/hr)(Operating hrs/yr)(lb/7000 gr)(ton/2000 lbs)(19,390 dscfm)

where:
Eb= the particulate emissions from the baghouse, in tons per year;
Operating gr/dscf = 0.0041 gr/dscf, or the grain loading determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate;
Operating hrs/yr = 8760 hrs/yr, or the actual hours of operation recorded in Section III.3.c above; and
19,390 dscfm = maximum air flow from the baghouse.

Et = Es + Eb

where:
Et = the total particulate emissions from the baghouse and wet scrubber, in tons per year.

d. Emission Limitation:
PM-10 emissions shall not exceed 0.0114 grains/dscf and 2.28 lbs/hr from the wet scrubber exhaust. PM-10 emissions shall not exceed 0.0041 grains/dscf and 0.68 lb/hr from the baghouse exhaust. PM-10 emissions shall not exceed 12.97 tons as a rolling, 12-month summation from both control devices.

Applicable Compliance Method:
Same as Section V.1.c above.

2. The facility shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months of the complete modification of this emissions unit.

b. The emissions testing shall be conducted to demonstrate compliance with the applicable emissions limitations of 0.0114 grain per dry standard cubic foot of wet scrubber exhaust, and 0.0041 grain per dry standard cubic foot of baghouse exhaust.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and Method 5 of 40 CFR Part 60, Appendix A and the modifications required by 40 CFR Part 60 Subpart OOO, Sections 60.675(b), (f) and (g). Alternative U.S. EPA approved test methods may be used with prior written approval from

the appropriate Ohio EPA District Office or local air agency.

d. The test(s) shall be conducted under maximum production rates unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

4. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

5. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P014 - Second floor pellet system controlled by a Tri-Mer wet scrubber (North Pellet scrubber) and MAC baghouse in parallel. Modified. Terms in this permit supercede those identified in PTI 02-2713 issued 4/14/99.		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None