



Environmental Protection Agency

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

7/26/2012

Certified Mail

Mr. Timothy DeClerck
Morton Salt, Inc.
151 S. Industrial St.
Rittman, OH 44270

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0285020059
Permit Number: P0110070
Permit Type: Initial Installation
County: Wayne

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Daily Recorder. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-NEDO; Canada



Synthetic Minor Write Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Morton Salt is an existing manufacturer of food and pharmaceutical grade salt from brine wells. The facility is proposing to install a new salt flaking operation subject to NSPS OOO, Nonmetallic Mineral Processing Plants. The emissions unit, P047, consists of two (2) new 5 TPH flakers, new & existing bins, new & existing conveying equipment (i.e. screw conveyors, belt conveyors and bucket elevators), and existing screens. The emissions unit is designed to flatten salt crystals, screen them by size and store them prior to packaging.

All salt emissions from the equipment composing the flaking operation are vented to a new, 28,000 cfm Tri-Mer Whirl/Wet scrubber.

3. Facility Emissions and Attainment Status:

Wayne County is unclassified for all criteria pollutants. The facility is a major stationary source for new source review for PE, SO_x, NO_x, and CO. The facility is operating under an extended Title V operating permit issued in 2001.

4. Source Emissions:

Emissions consist solely of particulate emissions. Uncontrolled particulate emissions are estimated at 216 pounds per hour.

The installation of the two new flakers, bins, and conveying equipment is a new installation of "affected facilities" according to NSPS Subpart OOO, and subjects the flakers and its associated conveying and storage equipment to the requirements in Subpart OOO. The emissions unit is located in a building. Each affected facility is controlled with all particulate emissions vented to the wet collector. Per Table 2 of the subpart, new affected facilities controlled by a wet collector are subject to a 0.014 gr/dscf PE limitation, but not subject to visible particulate emission limitations. Morton Salt must demonstrate compliance by stack testing and must demonstrate continued compliance by parametric monitoring of the control device egress per rule and this permit.

Allowable particulate emissions based upon the NSPS Subpart OOO are 14.7 tons per year of PE. The facility assumes all particulate emissions in the scrubber exhaust are PM₁₀/PM_{2.5} for permitting purposes. The allowable PM₁₀/PM_{2.5} emissions exceed the major modification thresholds of 15 TPY and 10 TPY, respectively.

The facility requests federally enforceable PM₁₀/PM_{2.5} limitations of 0.009 gr/dscf, 2.16 pounds, and 9.46 tons per year from the scrubber exhaust in order to reduce the potential PM₁₀/PM_{2.5} emissions below the major modification thresholds.

5. Conclusion:

The emission limitations on PM10/PM2.5 included in this permit is sufficiently federally enforceable to reduce the emissions below the major modification threshold. The permit requires daily parametric monitoring and recording on the scrubber, quarterly reporting of parameter deviations, and emission testing sufficient to ensure compliance.

6. Please provide additional notes or comments as necessary:

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>PE</u>	<u>9.46</u>

PUBLIC NOTICE
7/26/2012 Issuance of Draft Air Pollution Permit-To-Install

Morton Salt, Inc.
151 S. Industrial St.,
Rittman, OH 44270
Wayne County

FACILITY DESC.: Spice and Extract Manufacturing, All Other Miscellaneous Chemical Product and Preparation Manufacturing

PERMIT #: P0110070

PERMIT TYPE: Initial Installation

PERMIT DESC: Installation of salt flaking system with associated belts, conveyors, bins and screens controlled by a WhirlWet batch wet scrubber subject to NSPS Subpart OOO

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Amysue O'Reilly, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Morton Salt, Inc.**

Facility ID:	0285020059
Permit Number:	P0110070
Permit Type:	Initial Installation
Issued:	7/26/2012
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Morton Salt, Inc.

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Authorization

Facility ID: 0285020059
Facility Description: Processing of Raw salt
Application Number(s): A0044470, A0044893
Permit Number: P0110070
Permit Description: Installation of salt flaking system with associated belts, conveyors, bins and screens controlled by a WhirlWet batch wet scrubber subject to NSPS Subpart OOO
Permit Type: Initial Installation
Permit Fee: \$1,000.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/26/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Morton Salt, Inc.
151 S. Industrial St.
Rittman, OH 44270

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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: P0110070

Permit Description: Installation of salt flaking system with associated belts, conveyors, bins and screens controlled by a WhirlWet batch wet scrubber subject to NSPS Subpart OOO

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

Emissions Unit ID:	P047
Company Equipment ID:	P047 3rd floor flake system
Superseded Permit Number:	
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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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.
2. 40 CFR Part 60, Subpart OOO
 - a) Reporting Requirements
 - (1) In accordance with Section 60.676(a), the permittee shall submit the following information when existing pieces of equipment are replaced:
 - a. for a crusher, grinding mill, bucket elevator, bagging operation or enclosed truck or railcar loading station, 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;
 - 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;
 - c. for a conveyor belt, the width of the existing belt being replaced and the width of the replacement conveyor belt; and
 - 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.
 - (2) In accordance with Section 60.676(j), the permittee shall submit a notification to the Director of the actual date of initial startup of each affected facility. For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the owner or operator to the Director. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.
 - b) Applicability of Subpart A to Subpart OOO. The facilities are subject to the requirements of 40 CFR Part 60, Subpart A, except as clarified in Table 1 of 40 CFR Part 60, Subpart OOO.

C. Emissions Unit Terms and Conditions



1. P047, 3rd floor flake system

Operations, Property and/or Equipment Description:

Third Floor Flake System consisting of two new salt flakers, grinding mill, bins, screw conveyors, belt conveyors and bucket elevators and screens controlled by a 28,000 cfm Trimer Whirl/Wet scrubber.

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 operation(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 are identified below. 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.	ORC 3704.03(T)	Particulate emissions/ particulate emissions with a diameter less than 10 microns (PE/PM ₁₀) shall not exceed 0.009 gr/dscf from the wet collector exhaust.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D)(1)(a).
c.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D)(1)(a).
d.	OAC rule 3745-31-05(D)(1)(a) [Limit to avoid major modification]	PE/PM ₁₀ emissions shall not exceed 0.009 grain/dscf, 2.16 lbs/hr and 9.46 tons per year from the wet collector exhaust. Stack visible particulate emissions from the wet collector shall not exceed 0% opacity as a 6-minute average.
e.	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(D)(1)(a). Also see the requirements in B.2.

- (2) Additional Terms and Conditions
- a. None.
- c) Operational Restrictions
- (1) The emissions from this emissions unit shall be vented to a wet collector at all times the emissions unit is in operation. The wet collector shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the points of capture to the extent possible with good engineering design.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the wet collector (in pounds per square inch, gauge) during operation of this emissions unit, including periods of startup and shutdown.
- The permittee shall record the pressure drop across the wet collector on a daily basis.
- (2) The permittee shall properly install, operate, and maintain equipment to regulate the scrubbing liquid change frequency during operation of this emissions unit, including periods of startup and shutdown.
- The permittee shall maintain records that document the drain valve frequency and duration of the wet collector on a daily basis. Records may be maintained in an electronic form. The permittee shall monitor the drain valve frequency and duration in lieu of the scrubber liquid flow monitoring requirements in 60.376(c). The scrubber is not a continuous water flow, design type and, therefore, Ohio EPA has determined that the Section 60.674 flow monitoring requirement should not be included in this permit.
- (3) The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.
- The acceptable range or limit for the pressure drop across the wet collector and the scrubber liquid change frequency shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance. After the compliance demonstration, pressure drop across the wet collector shall be maintained not less than 30% below the average determined during the most recent performance test. After the compliance demonstration, the drain valve frequency and duration 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.
- The pressure drop monitoring device must be certified by the manufacturer to be accurate within ± 1 inch water gauge pressure and must be calibrated on an annual basis in accordance with the manufacturer's instructions.
- The scrubbing liquid flow rate actuating equipment must be verified on an annual basis to be correctly actuating the water changes.

- (4) Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop and drain valve readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (5) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the wet collector 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the wet collector and/or the drain valve parameters were outside of the appropriate range and the corrective actions initiated;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the wet collector;
 - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the pressure drop and/or the drain valve parameters into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit, were not implemented.
- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the wet collector serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

PE/PM₁₀ emissions shall not exceed 0.009 grain/dscf from the wet collector exhaust.

PE/PM₁₀ emissions shall not exceed 2.16 lbs/hr from the wet collector exhaust.

Applicable Compliance Method:

Compliance with the short term emission limitations shall be demonstrated through stack testing performed in accordance with the requirements specified in f)(2).

b. Emission Limitation:

PE/PM₁₀ emissions shall not exceed 9.46 tons per year from the wet collector exhaust.

Applicable Compliance Method:

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

$$E = (\text{Operating gr/dscf})(60 \text{ min/hr})(T)(\text{lb}/7000 \text{ gr})(\text{ton}/2000 \text{ lb})(\text{DCFM})$$

where:

E= the particulate emissions from the dry collector egress, in tons per year;

Operating gr/dscf = 0.009 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;

T = 8760 hrs/yr, or the actual hours of operation per year; and

DSCM =28,000 dscfm or maximum air flow from the wet collector determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate.

c. Emission Limitation:

Stack visible particulate emissions from the wet collector shall not exceed 0% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

- (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 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under 40 CFR 60.8.
 - b. The emissions testing shall be conducted to demonstrate compliance with the applicable PE/PM₁₀ limitations of 0.009 gr/dscf of exhaust gases and 2.16 lbs/hr.
 - c. The permittee shall monitor and record the pressure drop across the wet collector and the drain valve frequency and duration during each run of the stack test to establish the appropriate range for each operating parameter.



- d. 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, Section 60.675. Alternative U.S. EPA-approved test methods may be used with prior written approval from the Ohio EPA Northeast District Office.
 - e. The test(s) shall be conducted under maximum production rates unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - f. Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the 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 Ohio EPA Northeast District Office's refusal to accept the results of the emission tests.
 - g. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - h. 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 Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.
- g) Miscellaneous Requirements
- (1) None.