



Environmental Protection Agency

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

9/25/2012

Andrew Laituri  
FERRO CORPORATION  
1636 WAYSIDE RD  
CLEVELAND, OH 44112

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1318001085  
Permit Number: P0094312  
Permit Type: Renewal  
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

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

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

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: CDAQ





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
FERRO CORPORATION**

Facility ID:	1318001085
Permit Number:	P0094312
Permit Type:	Renewal
Issued:	9/25/2012
Effective:	9/25/2012
Expiration:	9/25/2022





Division of Air Pollution Control
Permit-to-Install and Operate
for
FERRO CORPORATION

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## Authorization

Facility ID: 1318001085  
Application Number(s): A0025805  
Permit Number: P0094312  
Permit Description: PTIO renewal permit for emissions units P001 and P006 (two jet dryers controlled by scrubber), P020 (fused stearate process controlled by baghouse), P032 (stearate milling process controlled by baghouses), and P036 (spray congealing tower controlled by fabric filter). PTI 13-870 issued 1/29/1982 for P032. PTI 13-2291 issued 5/30/1991 for P036.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 9/25/2012  
Effective Date: 9/25/2012  
Expiration Date: 9/25/2022  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

FERRO CORPORATION  
1636 WAYSIDE ROAD  
CLEVELAND, OH 44110

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

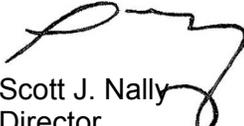
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality  
2nd Floor  
75 Erieview Plaza  
Cleveland, OH 44114  
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0094312

Permit Description: PTIO renewal permit for emissions units P001 and P006 (two jet dryers controlled by scrubber), P020 (fused stearate process controlled by baghouse), P032 (stearate milling process controlled by baghouses), and P036 (spray congealing tower controlled by fabric filter). PTI 13-870 issued 1/29/1982 for P032. PTI 13-2291 issued 5/30/1991 for P036.

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

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Line #1 Dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Line #2 Dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P020</b>
Company Equipment ID:	Line #7 Mill
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P032</b>
Company Equipment ID:	Line #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P036</b>
Company Equipment ID:	Line #7 Prill Tower
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

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



1. P001, Line #1 Dryer

Operations, Property and/or Equipment Description:

Jet Dryer Line #1 equipped with a baghouse for product reclaim and a venturi scrubber for control of particulate emissions

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 2.58 lbs/hr.

(2) Additional Terms and Conditions

a. The operations covered by this permit are the jet drying, baghouse collector for product reclaim, product silo and bagging station. Particulate emissions are controlled by a venturi scrubber.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall be between 30 to 40 pounds per square inch (gauge).

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber on a daily basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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 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.

These range(s) and/or limit(s) for the pressure drop are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted range or limit for the pressure drop based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber was outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
  - 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 into compliance with the appropriate range or limit contained in this permit, 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.

## f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent (20%) opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)(a).

b. Emission Limitation:

Particulate emissions shall not exceed 2.58 lbs/hr.

Applicable Compliance Method:

Compliance with the lb/hr particulate emission limitation shall be determined by multiplying the maximum hourly material handling rate of the emissions unit (1,000 lbs/hr), by (1- 0.4) which is the 40% moisture content of the material, (1- 0.995) which is the 99.5% inline baghouse material collector efficiency and (1- 0.90) which is the 90% wet scrubber control efficiency.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

## g) Miscellaneous Requirements

- (1) None.



2. P006, Line #2 Dryer

Operations, Property and/or Equipment Description:

Jet Dryer Line #2 equipped with a baghouse for product collecting and venturi scrubber for control of particulate emissions

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 2.12 lbs/hr.

(2) Additional Terms and Conditions

a. The operations covered by this permit are the jet drying, baghouse collector for product reclaim, product silo and bagging station. Particulate emissions are controlled by a venturi scrubber.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall be between 10 to 20 pounds per square inch (gauge).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge) during operation of this emissions unit(s), including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber on a daily basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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 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.

These range(s) and/or limit(s) for the pressure drop are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland DAQ. The permittee may request revisions to the permitted range or limit for the pressure drop based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber was outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
  - 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 into compliance with the appropriate range or limit contained in this permit, 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.

## f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent (20%) opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)(a).

b. Emission Limitation:

Particulate emissions shall not exceed 2.12 lbs/hr.

Applicable Compliance Method:

Compliance with the lb/hr particulate emission limitation shall be determined by multiplying the maximum hourly material handling rate of the emissions unit (750 lbs/hr), by (1- 0.5) which is the 50% moisture content of the material, (1-0.995) which is the 99.5% inline baghouse material collector efficiency and (1-0.90) which is the 90% wet scrubber control efficiency.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

## g) Miscellaneous Requirements

- (1) None.



3. P020, Line #7 Mill

Operations, Property and/or Equipment Description:

Stearate milling process. Particulate emissions are controlled by a baghouse.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 1.62 lbs/hr.

(2) Additional Terms and Conditions

a. The operations covered by this permit are a milling operation, baghouse collector, screener and a bagging station for the milled material. Particulate emissions are controlled by a baghouse.

c) Operational Restrictions

(1) The pressure drop across the baghouse shall be maintained within the range of 1.0 to 8.0 inches of water while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range 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 operation of the control equipment within the acceptable range 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 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 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.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall include in the annual PER the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

f) Testing Requirements

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

Visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent (20%) opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)(a).

- b. Emission Limitation:  
Particulate emissions shall not exceed 1.62 lbs/hr.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined through the use of the fabric filter manufacturer's design capture efficiency rate of 99.97% (1-0.9997) which is multiplied by the maximum process rate of the emissions unit (500 lbs/hr) to arrive at the lb/hr emission rate.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- g) Miscellaneous Requirements

- (1) None.



4. P032, Line #5

Operations, Property and/or Equipment Description:

Fused stearate process consisting of a flaker, blenders, mixers, screener, classifier and grinder. Particulate emissions are controlled by three baghouses.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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.	OAC rule 3745-31-05(A)(3)  (PTI #13-870 issued January 29, 1982)	The requirements of this rule include compliance with the emission limitations established pursuant to OAC rules OAC rule 3745-17-07(A), 17-07(B), 17-08(B) and OAC rule 3745-17-11(B)(1).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average.
c.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
d.	OAC rule 3745-17-08(B)	See b)(2)b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 4.76 lbs/hr.

(2) Additional Terms and Conditions

- a. The operations covered by this permit are a flaker, blending and milling operation, screener, classifier, crushing and grinding and a baghouse collector for the milled material. Particulate emissions are controlled by three baghouses.
- b. The permittee shall minimize or eliminate visible emissions of fugitive dust through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
  - i. the use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust to the baghouse product collectors; and
  - ii. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) The pressure drop across each of the baghouses shall be maintained within the range of 1.0 to 6.0 inches of water while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouses when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouses on a daily basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range 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 operation of the control equipment within the acceptable range 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 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 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.

This range or limit on the pressure drop across the baghouses is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall include in the annual PER the following information concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the pressure drop across any of the baghouses was outside of the range specified by the manufacturer;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent (20%) opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)(a).
    - b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed twenty percent (20%) opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.
    - c. Emission Limitation:

Particulate emissions shall not exceed 4.76 lbs/hr.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum process rate of the emissions unit (2,500 lbs/hr) by the estimated

loss of material through the process (1.2%) and the fabric filter's design control efficiency rate of 99.0% (1- 0.99) to arrive at the lb/hr emission rate.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- g) Miscellaneous Requirements
  - a. None.

**5. P036, Line #7 Prill Tower**

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

Spray congealing tower, Prill Tower #7. Particulate emissions are controlled by a fabric filter.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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.	OAC rule 3745-31-05(A)(3)  (PTI #13-2291 issued May 30, 1991)	Particulate emissions shall not exceed 0.01 grain per dry standard cubic foot and 0.75 lb/hour.  Particulate emissions shall not exceed 3.3 tons per year.  Visible particulate emissions from the stack serving this emissions unit shall not exceed zero percent (0%) opacity as a six-minute average.  There shall be no objectionable odors in the exhaust gases.
b.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The operations covered by this permit are the prill spray congealing tower, screener, oversize collector, fines collector and a packaging station. Particulate emissions are controlled by a baghouse.

c) Operational Restrictions

- (1) The pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range 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 operation of the control equipment within the acceptable range 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 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 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.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall include in the annual PER the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
- f) The Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
- Visible particulate emissions from the stack serving this emissions unit shall not exceed zero percent (0%) opacity as a six-minute average.
- Applicable Compliance Method:
- If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)(a).
- b. Emission Limitation:
- Particulate emissions shall not exceed 0.75 lb/hr.
- Applicable Compliance Method:
- Compliance with the hourly emission limitation may be determined by multiplying the maximum process rate of the emissions unit (1,500 lbs/hr), the estimated loss of material through the process (1.6%) and the fabric filter's design control efficiency rate of 99.0% (1- 0.99) to arrive at the lb/hr emission rate.
- If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.
- c. Emission Limitation:
- Particulate emissions shall not exceed 0.01 grain per dry standard cubic feet of exhaust gases.
- Applicable Compliance Method:
- Compliance with this emission limitation may be determined by multiplying the emission's unit's hourly emission rate established in f)(1)b. by the factor (1 hr/ 60 min), the factor ( 7,000 grains/ lb) and dividing by the baghouse rated exhaust flow rate of (8,700 dscf/min).
- If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- d. Emission Limitation:  
Particulate emissions shall not exceed 3.3 tons per year.

Applicable Compliance Method:  
Compliance with the annual limitation shall be based upon multiplying the short term emission limitation calculated in f)(1)b. by the annual operating hours of the emissions unit and the factor (1ton/2,000 lbs).

- g) Miscellaneous Requirements

(1) None.