



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
WOOD COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 03-17049**

**Fac ID: 0387000088**

**DATE: 1/26/2006**

Jones-Hamilton Company  
Ray Hahn  
30354 Tracy Road  
Walbridge, OH 43465-9792

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

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

CC: USEPA

NWDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 1/26/2006  
Effective Date: 1/26/2006**

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**FINAL PERMIT TO INSTALL 03-17049**

Application Number: 03-17049  
Facility ID: 0387000088  
Permit Fee: **\$1250**  
Name of Facility: Jones-Hamilton Company  
Person to Contact: Ray Hahn  
Address: 30354 Tracy Road  
Walbridge, OH 43465-9792

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**30354 Tracy Road  
Walbridge, Ohio**

Description of proposed emissions unit(s):  
**Modification to salt feed system.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

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.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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 emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

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

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

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

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

#### **10. 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.

#### **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **12. Best Available Technology**

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

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**13. Source Operation and Operating Permit Requirements After Completion of Construction**

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

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE (fugitive)	8.1
PM10 (stack)	1.58

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-07(B)
P901 - salt receiving, storage, and feed system (formerly permitted as emissions unit F003) modification to increase material throughput	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-11(B)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-08(B)	

Applicable Emissions  
Limitations/Control Measures

Fugitive emissions:

8.1 tons particulate emissions  
per year  
(from salt receiving operations)

Visible fugitive particulate  
emissions shall not exceed  
10% as a 3-minute average  
from the salt receiving pit

Stack emissions:

0.02 grains particulate matter  
less than 10 microns in size  
(PM10) per dscf; 1.58 tons  
PM10 per year (see A.2.f)

Visible particulate emissions  
shall not exceed 0% as a  
6-minute average from any  
stack associated with this  
emissions unit

see A.2.a

see A.2.b

see A.2.b

see A.2.g

see A.2.h

**2. Additional Terms and Conditions**

**2.a** Best Available Technology (BAT) control requirements for this emissions unit

has been determined to be the use of a baghouse/HEPA filter control system with a maximum outlet concentration of 0.02 grains per dry standard cubic foot (gr/dscf). The control system consists of a baghouse (BH-400) and two HEPA filters (IF-300 & IF-301) for particulate matter control associated with transferring/conveying and storage of salt in the feed system. Baghouse - BH-400 is used for pneumatic conveying and controlling the emissions from salt transfer into reactor vessels. HEPA filter IF-300 and IF-301 operate individually and control emissions vented from separate pressure vessel bins in the salt feed system.

- 2.b** The permittee shall employ best available control measures for the salt receiving operation (salt receiving pit) for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee maintains that the inherent physical nature of the salt material is such that fugitive dust emissions generated will be at a level that will be more than sufficient to comply with all applicable requirements. If at any time the inherent physical nature of the salt material becomes such that fugitive emissions generated do not meet the above applicable requirements, the permittee shall employ best available control measures to ensure compliance.
- 2.c** Best available control measures shall be employed if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.
- 2.d** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- 2.e** The emission limitations are less stringent than the emission limitations established pursuant to OAC 3745-31-05(A)(3).
- 2.f** All stack particulate matter emissions are PM10.
- 2.g** The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B).

Emissions Unit ID: **P901**

- 2.h** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (B) pursuant to OAC rule 3745-17-07 (B)(11)(e).

## **B. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.
2. The maximum amount of salt received for this emissions unit shall not exceed 90,000 tons per year.

## **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse (BH-400) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks associated with the HEPA filters (IF-300 & IF-301) for 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:
  - i. the location and color of the emissions;
  - ii. whether the emissions are representative of normal operations;
  - iii. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - iv. the total duration of any visible emission incident; and,
  - v. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (iv.) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

3. The permittee shall collect and record the following information each month for this emissions unit:

- a. The total tons per month of salt received; and
- b. The annual, year-to-date, tons of salt received (summation of 'a' for each calendar month from January to December).

#### D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the salt receiving pit, and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit annual reports that identify the total amount of salt received for emissions unit P901. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
0.02 gr PM10/dscf from baghouse/HEPA filter control system (BH-400, IF-300, IF-301)

Applicable Compliance Method:

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the baghouse and HEPA filters. If required, compliance with the particulate emission limitation shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202. Alternative U.S. EPA-approved test

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methods may be used with prior approval from the Ohio EPA, Northwest District Office.

- b. Emission Limitation:  
1.58 tons PM10 per year

Applicable Compliance Method:

The annual emission limitation was developed by multiplying the maximum outlet concentration of 0.02 gr PM10/dscf, the total maximum volumetric air flow rate of 2100 acfm (BH-400 = 750 acfm, IF-300 = 675 acfm, IF-301= 675 acfm), 60 minutes/hour, 1 pound/7000 grains, a maximum operating schedule of 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the maximum outlet concentration, compliance will also be shown with the annual limitation.

c. Emission Limitation:

Visible particulate emissions shall not exceed 0% as a 6-minute average from any stack associated with this emissions unit

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") , as such Appendix existed on July 1, 2002,

d. Emission Limitation:

8.1 tons fugitive particulate emissions per year (from salt receiving operations)

Applicable Compliance Method:

The emission limitation was established by multiplying an AP-42 emission factor of 0.18 lbs PE/ton (AP-42, Section 9.9.1 (3/2003)) by a maximum annual throughput of 90,000 tons and dividing by 2000 bls/ton. Therefore provided compliance is shown with the annual throughput restriction, compliance with the annual limitation will be assumed.

e. Emission Limitation

Visible fugitive particulate emissions shall not exceed 10% as a 3-minute average from the salt receiving pit

Applicable Compliance Method

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

- f. Emission Limitation  
The maximum amount of salt received for this emissions unit shall not exceed 90,000 tons per year.

**Jones**  
**PTI A**  
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Applicable Compliance Method

The permittee shall demonstrate compliance through the monitoring and record keeping in section C.3.

**F. Miscellaneous Requirements**

1. This permit supercedes the terms and conditions for this emissions unit in PTI #03-1458 issued on October 26, 1983. The emissions unit was identified in PTI #03-1458 as "Salt Unloading and Storage, Two Baghouses, and Raw Material Handling".