Facility Name: **Transco Railway Products Inc**
Application Number: **02-2459**
Date: **October 7, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule

3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Transco Railway Products Inc.** located in **Trumbull** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P002	Blast Room #2	Use of fabric filter	3745-31-05	Particulate matters:
			3745-17-08	0.03 gr/dscf 5.2 lbs/hr
			3745-17-07	Visible particulate emissions shall not exceed 20% opacity as a 3-minute average.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Facility Name: **Transco Railway Products Inc**
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PM	Tons/Year
	22.5 TPY

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA Northeast District Office**.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

Facility Name: **Transco Railway Products Inc**
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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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable State Regulation(s)

1. The following rules of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for this source:

   OAC Rule 3745-31-05
   OAC Rule 3745-17-07
   OAC Rule 3745-17-08

   (This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

B. Source Description

2. The emissions unit covered by this Permit to Install include: Blast Room #2, an abrasive blasting room vented to a fabric filter.

C. Allowable Emission Limitation

1. Particulate emissions shall not exceed 0.03 grains per dry standard cubic foot of exhaust gases or 5.2 pounds per hour.

2. Visible particulate emissons shall not exceed twenty per cent opacity, as a three minute average.

D. Monitoring and Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:

   a. the total amount of abrasive blasting material;

   b. the total hours of operation of the blast room.

E. Reporting Requirement

The permittee shall submit deviation (excursion) reports of each day during which the average hourly particulate matter emissions exceeded 5.2 pounds per hour.

F. Testing Requirements

1. Compliance with the emission limitation(s) in Section 3) of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation -
   5.2 lbs per hour of particulate matter.

   Applicable Compliance Method -
   To determine the actual emission rate for particulate matter, the following equation shall be used:

   E = (0.03 #PM/# abr. material)(AB)(1-.99) / (H), where

   E is the average hourly emission rate of particulate matter(pm)

   0.03 #/# abrasive material is the emission factor for pm , from a USEPA report "Development of Particulate Emission Factors for Uncontrolled Abrasive Blasting Operations" from MRI April 1994.

   AB is the amount of abrasive material used in this operation per day.

H is the total hours this process operates per day, and

1-.99 is a correction for the collector efficiency of 95%.

If required compliance shall be demonstrated as listed in OAC Rule 3745-17-03(B)(10).

b. Emission Limitation:
20% opacity limit for visible particulate matter emissions

Applicable Compliance Method:
Compliance shall be determined by visible emission evaluations performed in accordance with OAC Rule 3745-17-03(B)(3) using the methods and procedures specified in U.S. EPA Reference Method 9.