



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
JACKSON COUNTY**

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: 06-05770

DATE: 9/6/2000

Schrader & Son Inc.
Jeffrey Schrader
15317 Beaver Pike
Jackson, OH 45640

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

SEDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 06-05770

Application Number: 06-05770
APS Premise Number: 0640010102
Permit Fee: **\$1000**
Name of Facility: Schrader & Son Inc.
Person to Contact: Jeffrey Schrader
Address: 15317 Beaver Pike
Jackson, OH 45640

Location of proposed air contaminant source(s) [emissions unit(s)]:
15317 Beaver Pike
Jackson, Ohio

Description of proposed emissions unit(s):
50 TPH Dryer with Cyclone and Wet Scrubber.

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 Related to Monitoring and Recordkeeping 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 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)

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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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.

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

Schrader & Son Inc.
 PTI Application: 06-05770
 Issued: 9/6/2000

Facility ID: 0640010102

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>
Particulate	31.17

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>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - 50 TPH Dryer with Cyclone and Wet Scrubber.	40 CFR 60.672 NSPS Subpart OOO Stack Emissions	0.050 grams per dry standard cubic meter particulate (0.0218 gr/dscf) (7.12 lb/hr) (31.17 TPY) Fugitive emissions shall not exceed 10% opacity
	Fugitive Emissions (emissions not collected by a capture system)	
	OAC rule 3745-31-05	31.17 TPY Particulate

2. Additional Terms and Conditions

- 2.a The wet scrubber shall achieve an outlet emission rate of not greater than 0.050 grams per dry standard cubic meter of exhaust gases and there shall be no fugitive emissions greater than 10 % opacity

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the following information ;
 - a. The total tons of material that was transferred through this emission unit.
 - b. The total number of hours of operation for this emission unit.
2. The permittee shall maintain daily records which list the following information in accordance with

40 CFR 60.674 and 40 CFR 60.676 ;

- a. The pressure drop of the gas stream through the scrubber.
 - b. The flow rate of the scrubbing liquid to the wet scrubber.
3. The permittee shall perform daily observations for any visible particulate emissions (stack or fugitive) from this emission unit. The visible emission observations shall be conducted during a normal representative period when material is being transferred through the emission unit. The presence or absence of any visible particulate emissions (stack or fugitive) shall be recorded in an operation log. If any visible emissions are observed from the stack, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be recorded in the operations log.

D. Reporting Requirements

1. The permittee shall submit a semi-annual exceedance reports in accordance with 40 CFR 60.676, when the scrubber pressure drop or the scrubbers liquid flow rate differ by more than +/- 30 percent from the averaged rates determined from the most recent performance test. These reports shall be submitted by January 30 and July 30, respectively.
2. The permittee shall submit an annual exceedance report which identifies any exceedances of the above conditions, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 30 of each year. If an exceedance did not occur during the reporting period, then a report stating that fact is required.
3. For each excursion event, the following information shall be provided:
 - a. The date of the excursion;
 - b. The duration of the excursion event;
 - c. The operating rates during the excursion;
 - d. The cause(s) of the excursion; and,
 - e. The corrective action(s) which have or will be taken to prevent similar excursions in the future.

E. Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods :

Emission Limitation : 0.050 grams/dry standard cubic meter particulate emissions (31.17 TPY)

Applicable Compliance Method: Within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup of the emission unit, the permittee shall demonstrate compliance by testing in accordance with 40 CFR 60.8 and 40 CFR 60.675 . The owner or operator shall determine compliance with the particulate matter standard(s) by Method 5.

Annual emissions may be calculated in accordance with the emission rates obtained during the most recent stack test evaluation and the monitoring and record keeping requirements contained in this permit for the emission period.

Emission Limitation : Fugitive Emissions (10 percent opacity)

Applicable Compliance Method : Compliance shall be demonstrated by Method 9 or Method 22, 40 CFR Part 60, Appendix A , as applicable.

Emission Limitation : 31.17 TPY Particulate

Applicable Compliance Method: Annual emissions may be calculated in accordance with the emission rates obtained during the most recent stack test evaluation and the monitoring and record keeping requirements contained in this permit for the emission period.

F. Miscellaneous Requirements

None

Schrader & Son Inc.
PTI Application: 06-05770
Issued: 9/6/2000

Facility ID: 0640010102

NEW SOURCE REVIEW FORM B

PTI Number: 06-05770 Facility ID: 0640010102

FACILITY NAME Schrader & Son Inc.

FACILITY DESCRIPTION 50 TPH Dryer with Cyclone and Wet Scrubber. CITY/TWP Jackson

SIC CODE 3299 SCC CODE EMISSIONS UNIT ID P001 EMISSIONS UNIT DESCRIPTION 50 TPH Dryer
 DATE INSTALLED 8/2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants

Air Quality Description	Actual Emissions Rate		PTI Allowable	
	Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	5.30 lb/hr	23.21	0.050 g/dscm = to 31.17

PM₁₀
 Sulfur Dioxide
 Organic Compounds
 Nitrogen Oxides
 Carbon Monoxide
 Lead
 Other: Air Toxics

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$50000

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES x NO

IDENTIFY THE AIR CONTAMINANTS:

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$50000

Schrader & Son Inc.
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TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

NONE

Please provide any additional permit specific notes as you deem necessary:

NONE

Permit To Install Synthetic Minor Write-Up

NONE

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate	31.17

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PTI REVIEW CHECKLIST

PTI # 0605770

COMPLETE PACKAGE? - Check items (if included), arrange in this order

x 1. BAT/T&C forms named; on L: drive

2. Notes, explanation
 3. Netting/Syn. Minor

x 4. ERFs, Calculations
 5. Modeling

CALCULATIONS

ALL EMISSIONS UNITS

- x Uncontrolled hourly (max hourly in absence of controls)
- x Uncontrolled annual (uncontrolled hourly x 8760)
- x Actual hourly (max hourly after controls)
- x Actual annual (actual hourly x actual hours)
- x Allowable hourly (hourly limit allowed in T&Cs)
- x Allowable annual (allowable hourly x 8760)

SYNTHETIC MINOR or FESOP

- Restricted hourly (including enforceable synthetic minor operational limits)
- Restricted annual (including enforceable synthetic minor operational limits)

APPLICABLE RULES - For BAT: explain on Form B; cite SIP rule, NSPS, MACT, etc.

- | | | |
|--------------------------|--------------------------|--|
| YES | NO | |
| <input type="checkbox"/> | <input type="checkbox"/> | Title V - potential (max PTE @ 8760) |
| <input type="checkbox"/> | <input type="checkbox"/> | Title V - actual |
| <input type="checkbox"/> | <input type="checkbox"/> | FESOP (see OAC 3745-35-07) |
| <input type="checkbox"/> | <input type="checkbox"/> | MACT - Listed category: _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | HAP emissions > threshold |
| <input type="checkbox"/> | <input type="checkbox"/> | 112g - Title V for HAP, but no MACT issued |
| <input type="checkbox"/> | <input type="checkbox"/> | NESHAP |
| X | <input type="checkbox"/> | NSPS - Listed category: <u>UUU</u> |
| <input type="checkbox"/> | <input type="checkbox"/> | Affected facility(ies): <u>P001</u> |
| <input type="checkbox"/> | <input type="checkbox"/> | Exemptions: _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Nonattainment area |
| <input type="checkbox"/> | <input type="checkbox"/> | PSD/OFFSETS - potential (unc. max with fed enf control @ 8760) |
| <input type="checkbox"/> | <input type="checkbox"/> | PSD/OFFSETS - actual |
| <input type="checkbox"/> | <input type="checkbox"/> | Netting to avoid PSD/OFFSETS |
| <input type="checkbox"/> | <input type="checkbox"/> | Synthetic Minor to avoid PSD/OFFSETS |
| <input type="checkbox"/> | <input type="checkbox"/> | Modeling required |
| <input type="checkbox"/> | <input type="checkbox"/> | Air Toxics Policy - pollutant(s): _____ |

TITLE V	NONATTAINMENT
100 tpy criteria pollutant	
10 tpy single HAP	Coshocton: SO ₂
25 tpy total HAP	Gallia: SO ₂

PSD/OFFSETS APPLICABILITY
Existing facility >250 tpy allowable, or >100 tpy if facility one of 28 listed categories
THRESHOLDS - TPY

CO: 100
NOx: 40
SO₂: 40
TSP: 25
PM₁₀: 15
VOC: 40
Pb: 0.6
Hg: 0.1
Be: 0.0004
F: 3.0

MODELING THRESHOLDS - TPY

Asbestos: 0.007
Vinyl Chloride: 1.0
CO: 100
H₂SO₄ Mist: 7.0
H₂S: 10.0
SO₂: 25
Total Reduced S: 10.0
PM₁₀: 10
Pb: 0.6
Hg: 0.1
Be: 0.0004
F: 3.0
Toxics: 1.0
Asbestos: 0.007
Vinyl Chloride: 1.0
H₂SO₄ Mist: 7.0
H₂S: 10.0
Total Reduced S: 10.0

Schrader & Son Inc.
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TERMS AND CONDITIONS

- x All applicable rules listed, including exemptions
- x All SIP rules cited (as applicable: 17-07, 17-08, 17-11, 18, 21-07, 21-09, 23, 75)
- x Compliance determination and M, R, Rp for all limits, additional T&Cs and ORs
- x Short term limit, except tanks, roads, storage piles, material handling
- x TPY limit in applicable rules table
- x Adequate T&Cs to support all applicable rules checked above
- PTO template #: _____ Why not/Changes: _____

ENGINEERING REVIEW FORM

1. **Facility name:** Schrader & Son Inc.
2. **Permit application number:** 065770 , 0640010102
3. **Source description:** P001 - 50 TPH Dryer
4. **Year source installed/modified:** 2000
5. **Maximum rate (show units):** 50 TPH
6. **Emission rates:**

Pollutant	PSD/Ohio tpy	Total facility allowable tpy	Uncontrolled, #/hr	Uncontrolled, tpy	Actual #/hr	Actual tpy	Allowable #/hr	Allowable tpy
Particulate matter	--/--	0.162	3537	15492	5.3	23.21	8.14 (0.025 gr/dscf)	35.65
PM₁₀	15/10							
SO₂	40/25							
NO_x	40/25							

7. **PSD Major facility (see below)** **NSPS, Subpart UUU** **MACT, Subpart:**
Contemporaneous increases (allowable, last 2 yrs): PM: 0.162 SO₂: ____ NO_x: ____ CO: ____ OC: ____

8. **Identify regulation(s) governing this source and describe pertinent requirements and exemptions.**

NSPS-UUU, 0.057 gram/dscm (0.43698 gr/dscf / gram per dry std cubic meter) 0.025(gr/dscf)

9. **Control Strategy:** Enclosure with Cyclone and Wet Scrubber

10. **CALCULATIONS:**

Uncontrolled: Base: 10.86 gr/dscf @ 38000 cfm (60 min/hr) / 7000 gr/lb = 3537 lb/hr_{unc} (15492 tpy_{unc})

Allowable: Base: BAT 31-05 , 0.030 grain/dscf (38000 cfm) (60 min/hr) / 7000 gr/lb = 9.77 lb/hr (42.8 TPY)
 Base: NSPS-UUU, 0.057 gram/dscm (0.43698 gr/dscf / gram per dry std cubic meter) 0.025(gr/dscf)
 Which is equivalent to : 8.14 lb/hr (35.65 TPY) is more stringent than BAT

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OAC 3745-17-11 ; Table I, 50 tph = 44.6 lb/hr

OAC 3745-17-07 ; VE's = 20% / 6 minute avg. BOTH ARE LESS STRINGENT THAN BAT

Actual: Based on Control Efficiencies in the permit application:

3537 lb/hr (85%)(99%) 5.30 lb/hr (23.21 TPY) or 0.0163 gr/dscf

HAP emissions (max.): based on maximum HAP content and maximum coating usage

Toxics emissions: based on maximum toxics content and maximum coating usage

11. *Comments:* none

12. *Reviewer, date:* Steve Alspach 2/23/00