

Synthetic Minor Determination and/or  Netting Determination

Permit To Install 06-06301

**A. Source Description**

The Belden brick Co. operates six adjacent brick manufacturing facilities in Sugarcreek (Plants # 2, 3, 4-2, 6, 8, and 9) which are now considered to be one facility for Title V purposes. They propose to modify PTI # 06-5543 for the newest tunnel kiln and related equipment (Plant # 2). In conjunction with the startup of Plant # 2, they committed to install control equipment on the three tunnel kilns at Plant # 6 to use those emissions controls for netting purposes. They now wish to modify that previous permit to instead install the controls on the larger three tunnel kilns at Plant # 8 (which, unlike Plant # 6, will be affected by MACT) for netting Plant # 2, as before, and to also now offset an allowable emissions increase at Plant # 3.

The crushing plant has been modified from the original proposal to utilize dust suppression chemicals inside the total enclosure to eliminate the need for a fabric filter, although NSPS Subpart OOO is still applicable. The requirements relating to a fabric filter are being removed from this permit and replaced by the NSPS fugitive requirements.

**B. Facility Emissions and Attainment Status**

Belden Brick is a major stationary source. Tuscarawas County is designated as attainment for all pollutants. Total facility emissions are:

Particulate Matter = 622 TPY  
Sulfur Dioxide = 4450 TPY  
Nitrogen Oxides = 682 TPY  
Carbon Monoxide = 1777 TPY  
Organic Compounds = 77 TPY  
Hydrogen Fluoride = 267 TPY  
Hydrogen Chloride = 263 TPY

**C. Source Emissions**

Potential emissions from the new Plant # 2 are shown in the second column of the table below. Belden Brick has installed a dry sorbent injection system on Plant # 2 and has proposed to install a wet scrubber on Plant # 8 to control SO<sub>2</sub>, HF, and HCl. This will be followed by a fabric filter to control particulate matter. In addition, since clay raw materials contribute more to emissions than shale, they will limit the annual clay usage to 70% of the maximum total raw material usage at Plant # 2. The allowable emission levels, which include these federally enforceable restrictions, are shown in the third column.

Plant # 8 representative emissions were determined by stack tests on the kilns. The average of the last two years, 1999 and 2000, were used in the calculations. The increased emissions requested at Plant # 3 is shown in the fourth column. The control of the three tunnel kilns at Plant # 8 will result in the emission reductions shown in the fifth column. The net emission rates, which are all below the PSD significance levels, are shown in the sixth column. All values are in tons per year.

Pollutant	Plant 2 Potential	Plant 2 Allowable	Plant 3 Increase	Plant 8 Reduction	Net Emissions
PM	194.4	8.5		-14.3	-5.8
SO <sub>2</sub>	1054.5	65.8	124.4	-668.5	-478.3
NO <sub>x</sub>	49.1	15.9			15.9
CO	224.6	96.2			96.2
OC	1.0	1.9			1.9
HF	73.4	6.2		-76.1	-69.9
HCl	48.1	4.0			-42.3

**D. Conclusion**

The installation of Plant # 2 coupled with the reductions from the control of Plant # 8 will result in no increase of emissions above any PSD significance level. Federally enforceable restrictions on Plant # 2 will ensure 90% reduction of SO<sub>2</sub>, HF, and HCl while PM will be reduced 95% from levels already reduced by the restriction of clay to a maximum of 70% of the raw material.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
TUSCARAWAS COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov. Center

**Application No: 06-06301**

**DATE: 12/27/2001**

The Belden Brick Company  
John Jensen  
PO Box 430 475 Dover Rd  
Sugar creek, OH 44681

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$3800** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

SEDO

WV

PA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 06-06301**

Application Number: 06-06301  
APS Premise Number: 0679000118  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: The Belden Brick Company  
Person to Contact: John Jensen  
Address: PO Box 430 475 Dover Rd  
Sugarcreek, OH 44681

Location of proposed air contaminant source(s) [emissions unit(s)]:

**475 Dover Rd  
Sugarcreek, Ohio**

Description of proposed emissions unit(s):

**Tunnel Kiln 1 Administrative Modification to PTI 065543 issued 3 29 99.**

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

The Belden Brick Company

Facility ID: 0679000118

PTI Application: 06-06301

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## 2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## 5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

**The Belden Brick Company**

**Facility ID: 0679000118**

**PTI Application: 06-06301**

**Issued: To be entered upon final issuance**

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. 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.

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

**The Belden Brick Company**

**Facility ID: 0679000118**

**PTI Application: 06-06301**

**Issued: To be entered upon final issuance**

shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

**The Belden Brick Company**

**PTI Application: 06-06301**

**Facility ID: 0679000118**

**Issued: To be entered upon final issuance**

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

**11. 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.

**The Belden Brick Company**

**Facility ID: 0679000118**

**PTI Application: 06-06301**

**Issued: To be entered upon final issuance**

**B. State Only Enforceable 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 of state-only enforceable 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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. 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.

**4. 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.

**5. 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

**The Belden Brick Company**

**Facility ID: 0679000118**

**PTI Application: 06-06301**

**Issued: To be entered upon final issuance**

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.

**6. 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 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.

**7. 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.

**8. 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).

**The Belden Brick Company**

**PTI Application: 06-06301**

**Issued: To be entered upon final issuance**

**Facility ID: 0679000118**

**9. 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.

**10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

**C. 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.

<u>Pollutant</u>	<u>Tons Per Year</u>	
	Permit Allowable	Net Increase
PM	8.5	- 5.8
SO <sub>2</sub>	65.8	-478.3
NO <sub>x</sub>	15.9	15.9
CO	96.2	96.2
OC	1.9	1.9
HF	6.2	- 69.9
HCl	4.0	- 42.3

**The Belden Brick Company**

**PTI Application: 06-06301**

**Issued: To be entered upon final issuance**

**Facility ID: 0679000118**

**The B**

**PTI A**

Emissions Unit ID: F252

**Issued: To be entered upon final issuance**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

The B  
PTI A

Emissions Unit ID: F252

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
F252 - Modification of one clay and one shale crusher.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Emissions of particulate matter shall not exceed 0.3 ton per year.
	40 CFR 60.670 - 676 (NSPS Subpart OOO)	No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall check for the presence of any visible particulate emissions from openings in the grinding plant building each day when the grinding plant is in operation. The presence of any visible emissions from openings in the grinding plant building shall be noted in an operations log

along with the date and time that the visible emissions were observed.

#### **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from openings in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or Local Air Agency) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
2. The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in section 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with section 60.672(e).

#### **V. Testing Requirements**

1. Emission Limitation: 0.3 ton of particulate matter per year.

Compliance Method: Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.

Total grinding plant:  $(0.0052 \text{ \#/ton})(55\text{tph}) = 0.29 \text{ \#/hr}$

2. Emission Limitation: No visible fugitive emissions from the building.

Compliance Method: In determining compliance with section 60.672(e), the owner or operator shall use Method 22 to determine fugitive emissions. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

#### **VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. 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>
F252 - Modification of one clay and one shale crusher.	OAC rule 3745-31-05	

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

The B  
PTI A

Emissions Unit ID: F253

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
F253 - Modification of all material handling operations.	OAC rule 3745-31-05(A)(3)  40 CFR 60.670 - 676 (NSPS Subpart OOO)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Emissions of particulate matter shall not exceed 0.3 ton per year.  No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall check for the presence of any visible particulate emissions from openings in the grinding plant building each day when the grinding plant is in operation. The presence of any visible emissions from openings in the grinding plant building shall be noted in an operations log

along with the date and time that the visible emissions were observed.

#### **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from openings in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or Local Air Agency) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
2. The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in section 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with section 60.672(e).

#### **V. Testing Requirements**

1. Emission Limitation: 0.3 ton of particulate matter per year.

Compliance Method: Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.

Total grinding plant:  $(0.0052 \text{ \#/ton})(55\text{tph}) = 0.29 \text{ \#/hr}$

2. Emission Limitation: No visible fugitive emissions from the building.

Compliance Method: In determining compliance with section 60.672(e), the owner or operator shall use Method 22 to determine fugitive emissions. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

#### **VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. 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>
F253 - Modification of all material handling operations.	OAC rule 3745-31-05	

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

The B  
PTI A

Emissions Unit ID: F254

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
F254 - Modification of eight crushed material storage bins.	OAC rule 3745-31-05(A)(3)  40 CFR 60.670 - 676 (NSPS Subpart OOO)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Emissions of particulate matter shall not exceed 0.3 ton per year.  No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall check for the presence of any visible particulate emissions from openings in the grinding plant building each day when the grinding plant is in operation. The presence of any visible emissions from openings in the grinding plant building shall be noted in an operations log

**The Belden Brick Company**  
**PTI Application: 06-06301**  
**Issued**

**Facility ID: 0679000118**

Emissions Unit ID: F254

along with the date and time that the visible emissions were observed.

**Issued: To be entered upon final issuance****IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from openings in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or Local Air Agency) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
2. The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in section 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with section 60.672(e).

**V. Testing Requirements**

1. Emission Limitation: 0.3 ton of particulate matter per year.

Compliance Method: Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.

Total grinding plant:  $(0.0052 \text{ \#/ton})(55\text{tph}) = 0.29 \text{ \#/hr}$

2. Emission Limitation: No visible fugitive emissions from the building.

Compliance Method: In determining compliance with section 60.672(e), the owner or operator shall use Method 22 to determine fugitive emissions. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. 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>
F254 - Modification of eight crushed material storage bins.	OAC rule 3745-31-05	

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

The B  
PTI A

Emissions Unit ID: F255

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
F255 - Modification of one clay and one shale grinder.	OAC rule 3745-31-05(A)(3)  40 CFR 60.670 - 676 (NSPS Subpart OOO)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Emissions of particulate matter shall not exceed 0.3 ton per year.  No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall check for the presence of any visible particulate emissions from openings in the grinding plant building each day when the grinding plant is in operation. The presence of any visible emissions from openings in the grinding plant building shall be noted in an operations log

**The Belden Brick Company**  
**PTI Application: 06-06301**  
**Issued**

**Facility ID: 0679000118**

Emissions Unit ID: F255

along with the date and time that the visible emissions were observed.

**Issued: To be entered upon final issuance****IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from openings in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or Local Air Agency) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
2. The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in section 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with section 60.672(e).

**V. Testing Requirements**

1. Emission Limitation: 0.3 ton of particulate matter per year.

Compliance Method: Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.

Total grinding plant:  $(0.0052 \text{ \#/ton})(55\text{tph}) = 0.29 \text{ \#/hr}$

2. Emission Limitation: No visible fugitive emissions from the building.

Compliance Method: In determining compliance with section 60.672(e), the owner or operator shall use Method 22 to determine fugitive emissions. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. 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>
F255 - Modification of one clay and one shale grinder.	OAC rule 3745-31-05	

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**The B  
PTI A**

Emissions Unit ID: F256

**Issued: To be entered upon final issuance**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
F256 - Modification of four screening operations.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.
	40 CFR 60.670 - 676 (NSPS Subpart OOO)	Emissions of particulate matter shall not exceed 0.3 ton per year.
		No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall check for the presence of any visible particulate emissions from openings in the grinding plant building each day when the grinding plant is in operation. The presence of any visible emissions from openings in the grinding plant building shall be noted in an operations log

**The Belden Brick Company**  
**PTI Application: 06-06301**  
**Issued**

**Facility ID: 0679000118**

Emissions Unit ID: F256

along with the date and time that the visible emissions were observed.

**Issued: To be entered upon final issuance****IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from openings in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or Local Air Agency) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
2. The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in section 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with section 60.672(e).

**V. Testing Requirements**

1. Emission Limitation: 0.3 ton of particulate matter per year.

Compliance Method: Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.

Total grinding plant:  $(0.0052 \text{ \#/ton})(55\text{tph}) = 0.29 \text{ \#/hr}$

2. Emission Limitation: No visible fugitive emissions from the building.

Compliance Method: In determining compliance with section 60.672(e), the owner or operator shall use Method 22 to determine fugitive emissions. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

**VI. Miscellaneous Requirements**

None

The B  
PTI A

Emissions Unit ID: F256

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

**I. 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>
F256 - Modification of four screening operations.	OAC rule 3745-31-05	

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

### Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

#### A. State and Federally Enforceable Section

##### I. 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>
F257 - Modification of twelve ground material storage bins.	OAC rule 3745-31-05(A)(3)  40 CFR 60.670 - 676 (NSPS Subpart OOO)	The requirements of this rule also include compliance with the requirements of 40 CFR 60.670 - 676.  Emissions of particulate matter shall not exceed 0.3 ton per year.  No owner or operator shall cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions.

##### 2. Additional Terms and Conditions

2.a None

##### II. Operational Restrictions

None

##### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall check for the presence of any visible particulate emissions from openings in the grinding plant building each day when the grinding plant is in operation. The presence of any

**The Belden Brick Company**  
**PTI Application: 06-06301**  
**Issued**

**Facility ID: 0679000118**

Emissions Unit ID: F257

visible emissions from openings in the grinding plant building shall be noted in an operations log along with the date and time that the visible emissions were observed.

**Issued: To be entered upon final issuance****IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from openings in the grinding plant building and (b) describe the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or Local Air Agency) semiannually, i.e., by January 15 and July 15 of each year and shall cover the previous six months.
2. The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in section 60.672 of this subpart, including reports of observations using Method 22 to demonstrate compliance with section 60.672(e).

**V. Testing Requirements**

1. Emission Limitation: 0.3 ton of particulate matter per year.

Compliance Method: Compliance is based on emission factors developed during testing by USEPA at Plant 6 when gathering data to update AP-42 emission factors.

Total grinding plant:  $(0.0052 \text{ \#/ton})(55\text{tph}) = 0.29 \text{ \#/hr}$

2. Emission Limitation: No visible fugitive emissions from the building.

Compliance Method: In determining compliance with section 60.672(e), the owner or operator shall use Method 22 to determine fugitive emissions. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

**VI. Miscellaneous Requirements**

None

The B  
PTI A

Emissions Unit ID: F257

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

**I. 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>
F257 - Modification of twelve ground material storage bins.	OAC rule 3745-31-05	

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

The B  
PTI A

Emissions Unit ID: P201

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
P201 - Administrative modification of gas fired tunnel kiln vented to a dry scrubber and fabric filter.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(D)
Terms and conditions in this permit supersede those identified in PTI # 06-5543 issued 4/23/99.		OAC rule 3745-17-07(A)
		OAC rule 3745-17-11

Applicable Emissions  
Limitations/Control  
Measures

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

Emissions of particulate matter shall not exceed 1.9 pounds per hour nor 8.2 tons per year.

Emissions of sulfur dioxide shall not exceed 20.2 pounds per hour.

Emissions of nitrogen oxides shall not exceed 5.4 pounds per hour nor 23.7 tons per year.

Emissions of carbon monoxide shall not exceed 28.7 pounds per hour.

Emissions of hydrogen fluoride shall not exceed 1.4 pounds per hour nor 6.2 tons per year.

Emissions of hydrogen chloride shall not exceed 0.9 pounds per hour nor 4.0 tons per year.

Emissions of sulfur dioxide shall not exceed 65.8 tons per rolling 12-month period.

Emissions of carbon monoxide shall not exceed 96.2 tons per rolling 12-month period  
Visible emissions shall not

exceed 20% opacity except as provided by rule..

The requirements of this rule are less stringent than those defined in OAC rule 3745-31-05(A)(3) above.

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a.** The Belden Brick Company operates a brick making facility in Sugarcreek, Ohio consisting of several adjacent brick plants. Belden shall install control equipment on the three tunnel kilns at Plant 8 (P801 - P803) in order to reduce existing source emissions sufficiently to net out of PSD review for Plant 2 (P201). Belden shall install a continuous emissions monitoring system on the existing Plant 8. This system shall be functionally equivalent to the system described in this permit for Plant 2. Adequate records shall be kept by the Plant 8 CEMS to document the compliance status of Plant 2 with applicable PSD significance levels. The Belden Brick Company shall not violate those significance levels. The table below summarizes the average netted emission rates, in tons per year, for Plant 8 over the last two years (1999 and 2000), assuming the control equipment achieves the manufacturer's specified control efficiencies of 70% for SO<sub>2</sub>, 90% for HF, and HCl and 95% for PM.

POLLUTANT	PLANT 2 EMISSIONS	PLANT 8 AVG. EMISSIONS (UNCONTROLLED)	PLANT 8 AVG. EMISSIONS REDUCTION	PLANT 3 EMISSIONS INCREASE	NET INCREASE
Particulate Matter	8.5	15.2	14.3		-5.8
Sulfur Dioxide	65.8	1026.3	668.5	124.4	-478.3
Nitrogen Oxides	23.7	36	0		23.7
Carbon Monoxide	96.2	140	0		96.2
VOC	1.9	1	0		1.9
Hydrogen Fluoride	6.2	86.2	76.1		-69.9
Hydrogen Chloride	4	52.5	46.3		-42.3

**II. Operational Restrictions**

1. Usage (firing) of fireclay shall not exceed 63,482 tons during any 12-month period. Raw material used in this emissions unit consists primarily of shale and fireclay. Testing of raw materials and stack emissions indicate that fireclay contributes much more than shale to the emissions of sulfur dioxide and carbon monoxide. In order to restrict annual emissions to levels at which no computer modeling is required by the PSD rules and/or the Ohio EPA air toxics policy, the permittee has requested that the usage (firing) of fireclay be restricted to 70% of the raw materials used. This limit was calculated from the annualized dry process weight rate as shown in the following equation:  $(20705 \text{ \#/hr})(8760 \text{ hr/yr})(70\% \text{ clay})(0.0005 \text{ ton/\#}) = 63482 \text{ tons/yr}$ . This requirement, which will limit the uncontrolled emission rate, combined with the control requirement will assure compliance with the annual emission limits. Compliance with the annual usage limitation shall be based upon a rolling, 12-month summation of the fireclay used (fired). The facility already has at least 11 months data on record.

**Issued: To be entered upon final issuance**

2. The pressure drop across the baghouse shall be maintained within the range established during the most recent stack test of P201 which demonstrated compliance with the particulate emissions limit.
3. During any period of CEMS downtime which exceeds 3 hours, all scrubber reagent feed rates shall be set to the maximum rates which were recorded for the same product during its most recent run.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records both of the raw material used (fired) and the total fireclay content, in tons, for all products fired in the tunnel kiln.
2. For sulfur dioxide, carbon monoxide, and exhaust gas flow:

The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub>, CO, and flow from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub>, CO, and flow monitoring system including, but not limited to, pressure, temperature, ACFM, and real time data gathered from the differential optical absorption spectroscopy system for SO<sub>2</sub> and CO emissions in units of the applicable standard (pounds per hour), results of daily calibration checks, and magnitude of any calibration adjustments.

Within 180 days of the installation of the CEMS, the permittee shall develop a written quality assurance/quality control plan for the continuous SO<sub>2</sub>, CO, and flow monitoring system designed to ensure continuous valid and representative readings of SO<sub>2</sub>, CO, and flow. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous SO<sub>2</sub>, CO, and flow monitoring system must be kept on site and available for inspection during regular office hours.

Each continuous monitoring system consists of all the equipment used to acquire data and includes any sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The data obtained from the CEMS shall be used to determine compliance with the applicable emission limitation.

Emissions Unit ID: P201

If at any time it is determined that the continuous monitor cannot adequately document the compliance status of the tunnel kiln, the permittee shall immediately begin complying with the requirements of Section A.II.3 and the associated requirements pertaining to the continuous monitor shall no longer be applicable.

3. For hydrogen fluoride and hydrogen chloride:

The hydrogen fluoride and hydrogen chloride monitoring system must be installed prior to start up.

The permittee shall operate and maintain existing equipment to continuously monitor and record hydrogen fluoride and hydrogen chloride from this emissions unit in units of the applicable standard. The permittee shall maintain records of all data obtained by the hydrogen fluoride and hydrogen chloride monitoring system including, but not limited to, pressure, temperature and real time data gathered from the differential optical absorption spectroscopy system for hydrogen fluoride and hydrogen chloride emissions in units of the applicable standard (pounds per hour), results of daily calibration checks, and magnitude of any calibration adjustments.

Within one hundred eighty (180) days of installation of the CEMS, the permittee shall develop a written quality assurance/quality control plan for the CEMS designed to ensure continuous valid and representative readings of hydrogen fluoride and hydrogen chloride. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. A logbook dedicated to the monitoring system must be kept on site and available for inspection during regular office hours.

Each continuous monitoring system consists of all the equipment used to acquire data and includes any sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The data obtained from the CEMS shall be used to determine compliance with the applicable emission limitation.

If at any time it is determined that the continuous monitor cannot adequately document the compliance status of the tunnel kiln, the permittee shall immediately begin complying with the requirements of Section A.II.3 and the associated requirements pertaining to the continuous monitor shall no longer be applicable.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse 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 continuous basis.
5. 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, if a strip-chart recorder is employed for continuous

Emissions Unit ID: P201

monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

6. The permittee shall maintain daily records of all scrubber reagent feed rates (maximum actual rates or set points) and the associated product in the kiln at the time.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all months during which the usage of fireclay was above the maximum specified level during any cumulative monthly period for the first year or any subsequent 12-month period.
2. The permittee shall submit 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 in Section A.II.2.
3. The permittee shall submit deviation (excursion) reports that identify all periods of CEMS downtime during which the scrubber reagent feed rates were less than the maximum actual feed rate or set point which was previously associated with the product being run.
4. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of SO<sub>2</sub> and CO values in excess of the applicable limit(s) specified in the air summary of this permit.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting any continuous SO<sub>2</sub>, CO, and flow monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall address the data obtained during the previous calendar quarter.

Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report. The summary shall be submitted

**Issued: To be entered upon final issuance**

to the Ohio EPA, Southeast District Office within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

5. The permittee shall submit reports within thirty (30) days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting all instances of hydrogen fluoride and hydrogen chloride values in excess of the limitations specified in the terms and conditions of this permit, detailing the date, commencement and completion times, duration, magnitude, reason (if known) and corrective actions taken (if any) of all values above the applicable emission limitations.

The permittee shall submit reports within thirty (30) days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting any continuous hydrogen fluoride and hydrogen chloride monitoring system downtime while the emissions unit was on-line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of source and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report. If there are no excess emissions during the calendar quarter, then the permittee shall submit a statement to that effect along with the emissions unit and monitor operating times. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall address the data obtained during previous calendar quarter.

Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report. The summary shall be submitted to the Ohio EPA, Southeast District Office within thirty (30) days following the end of each calendar quarter in a manner prescribed by the Director.

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. 20% opacity, as a six minute average, except as provided by rule

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit, but, if appropriate, may be

Emissions Unit ID: P201

requested pursuant to OAC rule 3745-15-04(A).

- b. Sulfur dioxide emissions shall not exceed 20.2 pound per hour nor 65.8 tons per rolling 12-month period. Carbon monoxide emissions shall not exceed 28.7 pounds per hour nor 96.2 tons per rolling 12-month period. Hydrogen fluoride emissions shall not exceed 1.4 pound per hour nor 6.2 tons per year. Hydrogen chloride emissions shall not exceed 0.9 pound per hour nor 4.0 tons per year.

Applicable Compliance Method:

Compliance with the sulfur dioxide, carbon monoxide, hydrogen fluoride, and hydrogen chloride emission limitations shall be based upon the records and report data specified in sections A.III.2 and A.III.3. Data from the Plant # 8 continuous emissions monitors shall be used, as necessary, to demonstrate that the PSD significance levels have not been exceeded. If required, the permittee shall demonstrate compliance with the allowable mass emission rate for sulfur dioxide, carbon monoxide, hydrogen fluoride, and hydrogen chloride in accordance with the methods and procedures specified in 40 CFR Part 60 Appendix A.

- c. Particulate matter emissions shall not exceed 1.9 pound per hour nor 8.2 tons per year. Nitrogen oxides emissions shall not exceed 5.4 pound per hour nor 23.7 tons per year.

Applicable Compliance Method:

Compliance with the hourly particulate matter and nitrogen oxides emissions limitations shall be based on the latest stack test. Annual limitations shall be calculated by multiplying the hourly emission rates by 8760 hours per year and dividing by 2000 pounds per ton.

## **VI. Miscellaneous Requirements**

1. Within 120 days after promulgation of the 40 CFR 63 Subpart JJJJ for Brick and Structural Clay Products Manufacturing, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
  - a. the name and mailing address of the permittee;
  - b. the physical location of the source if it is different from the mailing address;
  - c. identification of the relevant MACT standard and the permittee's compliance date;
  - d. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and,

Emissions Unit ID: P201

- e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
2. Within 60 days following completion of the required compliance demonstration activity specified in the 40 CFR 63 Subpart JJJJJ for Brick and Structural Clay Products Manufacturing, the permittee shall submit a notification of compliance status that contains the following information:
- a. the methods used to determine compliance;
  - b. the results of any performance tests, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
  - c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
  - d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in the 40 CFR 63 Subpart JJJJJ for Brick and Structural Clay Products Manufacturing;
  - e. an analysis demonstrating whether the affected source is a major source or an area source;
  - f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and,
  - g. a statement of whether or not the permittee has complied with the requirements of the 40 CFR 63 Subpart JJJJJ for Brick and Structural Clay Products Manufacturing.

The B  
PTI A

Emissions Unit ID: P201

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

**I. 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>
P201 - Administrative modification of gas fired tunnel kiln vented to a dry scrubber and fabric filter.	OAC rule 3745-31-05	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit P201 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hydrogen fluoride

TLV (ug/m3): 2600

48

**The Belden Brick Company**  
**PTI Application: 06-06301**  
**Issued**

**Facility ID: 0679000118**

Emissions Unit ID: P201

Maximum Hourly Emission Rate (lbs/hr): 1.41

**Issued: To be entered upon final issuance**

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 20.89

MAGLC (ug/m3): 61.90

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still

**Issued: To be entered upon final issuance**

satisfies the "Air Toxic Policy"; and

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

51

**The B**

**PTI A**

**Issued: To be entered upon final issuance**

Emissions Unit ID: P201

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

The B  
PTI A

Emissions Unit ID: P301

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
P301 - Chapter 31 Modification of Plant 3 Tunnel Kiln 1, a gas fired tunnel kiln vented to a dry scrubber and fabric filter.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)
Terms and conditions in this permit supersede those identified in PTI # 06-695 issued 4/29/81.		OAC rule 3745-17-11
		OAC rule 3745-18-06

**The B  
PTI A**

Emissions Unit ID: P301

**Issued: To be entered upon final issuance**

Applicable Emissions <u>Limitations/Control</u> <u>Measures</u>	
Emissions of particulate matter shall not exceed 4.2 pounds per hour nor 18.4 tons per year.	exceed 20% opacity as a 6-minute average, except as provided by the rule.
Emissions of sulfur dioxide shall not exceed 35.0 pounds per hour nor 153.3 tons per year.	See section A.I.2.a.
Emissions of nitrogen oxides shall not exceed 6.0 pounds per hour nor 26.3 tons per year.	See section A.I.2.a.
Emissions of carbon monoxide shall not exceed 22.1 pounds per hour nor 99.0 tons per year.	
Emissions of hydrogen fluoride shall not exceed 1.9 pounds per hour nor 8.3 tons per year.	
Emissions of hydrogen chloride shall not exceed 1.2 pounds per hour nor 5.4 tons per year.	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).	
Visible particulate emissions from any stack shall not	

**2. Additional Terms and Conditions**

- 2.a** The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b** The Belden Brick Company operates a brick making facility in Sugarcreek, Ohio consisting of several adjacent brick plants. Belden shall install control equipment on the three tunnel kilns at Plant 8 (P801 - P803) in order to reduce existing source emissions sufficiently to offset an increase in the allowable emissions rate for sulfur dioxide at Plant 3 (P301). Belden shall install a continuous emissions monitoring system on the existing Plant 8. This system shall be functionally equivalent to the system described in this permit for Plant 2 (P201). Adequate records shall be kept by the Plant 8 CEMS to document that the emissions increase at Plant 3 from 6.6 to 35.0 pounds per hour is being offset each year. The table below summarizes the average netted emission rates, in tons per year, for Plant 8 over the last two years (1999 and 2000), assuming the control equipment achieves the manufacturer's specified control efficiencies of 70% for SO<sub>2</sub>, 90% for HF, and HCl and 95% for PM.

POLLUTANT	PLANT 2 EMISSIONS	PLANT 8 AVG. EMISSIONS (UNCONTROLLED)	PLANT 8 AVG. EMISSIONS REDUCTION	PLANT 3 EMISSIONS INCREASE	NET INCREASE
Particulate Matter	8.5	15.2	14.3		-5.8
Sulfur Dioxide	65.8	1026.3	668.5	124.4	-478.3
Nitrogen Oxides	23.7	36	0		23.7
Carbon Monoxide	96.2	140	0		96.2
VOC	1.9	1	0		1.9
Hydrogen Fluoride	6.2	86.2	76.1		-69.9
Hydrogen Chloride	4	52.5	46.3		-42.3

**II. Operational Restrictions**

- The permittee shall burn only natural gas in this emissions unit.
- The pressure drop across the baghouse shall be maintained within the range established during the most recent stack test of P301 which demonstrated compliance with the particulate emissions limit.
- During any period of CEMS downtime which exceeds 3 hours, all scrubber reagent feed rates shall be set to the maximum rates which were recorded for the same product during its most recent run.

**III. Monitoring and/or Recordkeeping Requirements**

- For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

**Issued: To be entered upon final issuance**

2. For sulfur dioxide, carbon monoxide, and exhaust gas flow:

The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub>, CO, and flow from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub>, CO, and flow monitoring system including, but not limited to, pressure, temperature, ACFM, and real time data gathered from the differential optical absorption spectroscopy system for SO<sub>2</sub> and CO emissions in units of the applicable standard (pounds per hour), results of daily calibration checks, and magnitude of any calibration adjustments.

Within 180 days of the installation of the CEMS, the permittee shall develop a written quality assurance/quality control plan for the continuous SO<sub>2</sub>, CO, and flow monitoring system designed to ensure continuous valid and representative readings of SO<sub>2</sub>, CO, and flow. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous SO<sub>2</sub>, CO, and flow monitoring system must be kept on site and available for inspection during regular office hours.

Each continuous monitoring system consists of all the equipment used to acquire data and includes any sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The data obtained from the CEMS shall be used to determine compliance with the applicable emission limitation.

If at any time it is determined that the continuous monitor cannot adequately document the compliance status of the tunnel kiln, the permittee shall immediately begin complying with the requirements of Section A.II.3 and the associated requirements pertaining to the continuous monitor shall no longer be applicable.

3. For hydrogen fluoride and hydrogen chloride:

The hydrogen fluoride and hydrogen chloride monitoring system must be installed prior to start up.

The permittee shall operate and maintain existing equipment to continuously monitor and record hydrogen fluoride and hydrogen chloride from this emissions unit in units of the applicable standard. The permittee shall maintain records of all data obtained by the hydrogen fluoride and hydrogen chloride monitoring system including, but not limited to, pressure, temperature and real time data gathered from the differential optical absorption spectroscopy system for hydrogen fluoride and hydrogen chloride emissions in units of the applicable standard (pounds per hour), results of daily calibration checks, and magnitude of any calibration adjustments.

Within one hundred eighty (180) days of installation of the CEMS, the permittee shall develop a written quality assurance/quality control plan for the CEMS designed to ensure continuous valid and representative readings of hydrogen fluoride and hydrogen chloride. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. A logbook dedicated to the monitoring system must be kept on site and available for inspection during regular office hours.

Each continuous monitoring system consists of all the equipment used to acquire data and includes any sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The data obtained from the CEMS shall be used to determine compliance with the applicable emission limitation.

If at any time it is determined that the continuous monitor cannot adequately document the compliance status of the tunnel kiln, the permittee shall immediately begin complying with the requirements of Section A.II.3 and the associated requirements pertaining to the continuous monitor shall no longer be applicable.

4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse 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 continuous basis.
5. 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, if a strip-chart recorder is employed for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.
6. The permittee shall maintain daily records of all scrubber reagent feed rates (maximum actual

**Issued: To be entered upon final issuance**

rates or set points) and the associated product in the kiln at the time.

**IV. Reporting Requirements**

1. The permittee shall submit 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 in Section A.II.2.
2. The permittee shall submit deviation (excursion) reports that identify all periods of CEMS downtime during which the scrubber reagent feed rates were less than the maximum actual feed rate or set point which was previously associated with the product being run.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of SO<sub>2</sub> and CO values in excess of the applicable limit(s) specified in the air summary of this permit.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting any continuous SO<sub>2</sub>, CO, and flow monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall address the data obtained during the previous calendar quarter.

Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031, the

Emissions Unit ID: P301

permittee shall submit a summary of the excess emission report. The summary shall be submitted to the Ohio EPA, Southeast District Office within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

5. The permittee shall submit reports within thirty (30) days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting all instances of hydrogen fluoride and hydrogen chloride values in excess of the limitations specified in the terms and conditions of this permit, detailing the date, commencement and completion times, duration, magnitude, reason (if known) and corrective actions taken (if any) of all values above the applicable emission limitations.

The permittee shall submit reports within thirty (30) days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting any continuous hydrogen fluoride and hydrogen chloride monitoring system downtime while the emissions unit was on-line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of source and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report. If there are no excess emissions during the calendar quarter, then the permittee shall submit a statement to that effect along with the emissions unit and monitor operating times. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall address the data obtained during previous calendar quarter.

Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report. The summary shall be submitted to the Ohio EPA, Southeast District Office within thirty (30) days following the end of each calendar quarter in a manner prescribed by the Director.

## **V. Testing Requirements**

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

- a. Emission Limitation:

4.2 lbs/hr of particulates; 18.4 tons/yr

Applicable Compliance Method:

Compliance with the hourly particulate matter emissions limitation shall be based on the latest stack test. The annual limitation shall be calculated by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 pounds per ton.

- b. Emission Limitation:

**The Belden Brick Company**  
**PTI Application: 06-06301**  
**Issued**

**Facility ID: 0679000118**

35.0 lbs/hr of sulfur dioxide; 153.3 tons/yr

Emissions Unit ID: P301

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance with the sulfur dioxide emission limitations shall be based upon the records and report data specified in sections A.III.2 and A.III.3. Data from the Plant # 8 continuous emissions monitors shall be used, as necessary, to demonstrate that the emission limits have not been exceeded. If required, the permittee shall demonstrate compliance with the allowable mass emission rate for sulfur dioxide, carbon monoxide, hydrogen fluoride, and hydrogen chloride in accordance with the methods and procedures specified in 40 CFR Part 60 Appendix A.

c. Emission Limitation:

6.0 lbs/hr of nitrogen oxides

Applicable Compliance Method:

Compliance with the NO<sub>x</sub> emission limits have been determined by the use of AP-42, Table 11.3-3 (8/97) emission factors as shown in the following equations:

$$\text{NO}_x: (0.35 \text{ \#/ton product})(13.78 \text{ ton/hr}) = 4.823 \text{ \#/hr}$$

$$(4.823 \text{ \#/hr})(8760 \text{ hr/yr})(0.0005 \text{ ton/\#}) = 21.13 \text{ TPY}$$

Emission tests also may be required in accordance with applicable methods from 40 CFR Part 60, Appendix A. No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04 (A).

d. Emission Limitation:

Emissions of carbon monoxide shall not exceed 22.1 pounds per hour nor 99.0 tons per year. Emissions of hydrogen fluoride shall not exceed 1.9 pounds per hour nor 8.3 tons per year. Emissions of hydrogen chloride shall not exceed 1.2 pounds per hour nor 5.4 tons per year.

Applicable Compliance Method:

Compliance with the carbon monoxide, hydrogen fluoride, and hydrogen chloride emission limitations shall be based upon the records and report data specified in sections A.III.2 and A.III.3. Data from the Plant # 8 continuous emissions monitors shall be used, as necessary, to demonstrate that the emission limits have not been exceeded. If required, the permittee shall demonstrate compliance with the allowable mass emission rate for

61

**The B**

**PTI A**

Emissions Unit ID: P301

**Issued: To be entered upon final issuance**

sulfur dioxide, carbon monoxide, hydrogen fluoride, and hydrogen chloride in accordance with the methods and procedures specified in 40 CFR Part 60 Appendix A.

**Issued: To be entered upon final issuance**

e. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

**VI. Miscellaneous Requirements**

1. Within 120 days after promulgation of the 40 CFR 63 Subpart JJJJJ for Brick and Structural Clay Products Manufacturing, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
  - a. the name and mailing address of the permittee;
  - b. the physical location of the source if it is different from the mailing address;
  - c. identification of the relevant MACT standard and the permittee's compliance date;
  - d. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and,
  - e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
  
2. Within 60 days following completion of the required compliance demonstration activity specified in the 40 CFR 63 Subpart JJJJJ for Brick and Structural Clay Products Manufacturing, the permittee shall submit a notification of compliance status that contains the following information:
  - a. the methods used to determine compliance;
  - b. the results of any performance tests, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures

Emissions Unit ID: P301

or methods that were conducted;

- c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
- d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in the 40 CFR 63 Subpart JJJJJ for Brick and Structural Clay Products Manufacturing;
- e. an analysis demonstrating whether the affected source is a major source or an area source;
- f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and,
- g. a statement of whether or not the permittee has complied with the requirements of the 40 CFR 63 Subpart JJJJJ for Brick and Structural Clay Products Manufacturing.

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. 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>
P301 - Chapter 31 Modification of Plant 3 Tunnel Kiln 1, a gas fired tunnel kiln vented to a dry scrubber and fabric filter.	OAC rule 3745-31-05	LIMIT(s)

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

65

**The B**

**PTI A**

**Issued: To be entered upon final issuance**

None

Emissions Unit ID: P301

**NEW SOURCE REVIEW FORM B**

PTI Number: 06-06301 Facility ID: 0679000118

FACILITY NAME The Belden Brick Company

FACILITY DESCRIPTION Tunnel Kiln 1 Administrative Modification CITY/TWP Sugarcreek  
to PTI 065543 issued 3 29 99.

SIC CODE 3251 SCC CODE 30504615 EMISSIONS UNIT ID F252

EMISSIONS UNIT DESCRIPTION Modification of one clay and one shale crusher.

DATE INSTALLED 9/98

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		No VE	0.3	No VE	0.3
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

Total enclosure, dust suppression chemicals.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**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: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 06-06301 Facility ID: 0679000118

FACILITY NAME The Belden Brick Company

FACILITY DESCRIPTION Tunnel Kiln 1 Administrative Modification CITY/TWP Sugarcreek

Emissions Unit ID: P301

SIC CODE 3251 SCC CODE 30504603 EMISSIONS UNIT ID F253

EMISSIONS UNIT DESCRIPTION Modification of all material handling operations.

DATE INSTALLED 9/98

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		No VE	0.3	No VE	0.3
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

Total enclosure, dust suppression chemicals.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**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:

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: P301

FACILITY DESCRIPTION Tunnel Kiln 1 Administrative Modification CITY/TWP Sugarcreek  
to PTI 065543 issued 3 29 99.

SIC CODE 3251 SCC CODE 30504602 EMISSIONS UNIT ID F254

EMISSIONS UNIT DESCRIPTION Modification of eight crushed material storage bins.

DATE INSTALLED 9/98

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		No VE	0.3	No VE	0.3
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

**Total enclosure, dust suppression chemicals.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**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:

**NEW SOURCE REVIEW FORM B**

PTI Number: 06-06301 Facility ID: 0679000118

FACILITY NAME The Belden Brick Company

FACILITY DESCRIPTION Tunnel Kiln 1 Administrative Modification CITY/TWP Sugarcreek

Emissions Unit ID: P301

SIC CODE 3251 SCC CODE 30504619 EMISSIONS UNIT ID F255

EMISSIONS UNIT DESCRIPTION Modification of one clay and one shale grinder.

DATE INSTALLED 9/98

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		No VE	0.3	No VE	0.3
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

Total enclosure, dust suppression chemicals.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**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:

**NEW SOURCE REVIEW FORM B**

PTI Number: 06-06301 Facility ID: 0679000118

FACILITY NAME The Belden Brick Company

FACILITY DESCRIPTION Tunnel Kiln 1 Administrative Modification CITY/TWP Sugarcreek

Emissions Unit ID: P301

SIC CODE 3251 SCC CODE 30504629 EMISSIONS UNIT ID F256

EMISSIONS UNIT DESCRIPTION Modification of four screening operations.

DATE INSTALLED 9/98

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		No VE	0.3	No VE	0.3
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

Total enclosure, dust suppression chemicals.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**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:

**NEW SOURCE REVIEW FORM B**

PTI Number: 06-06301 Facility ID: 0679000118

FACILITY NAME The Belden Brick Company

FACILITY DESCRIPTION Tunnel Kiln 1 Administrative Modification CITY/TWP Sugarcreek

Emissions Unit ID: P301

SIC CODE 3251 SCC CODE 30504602 EMISSIONS UNIT ID F257

EMISSIONS UNIT DESCRIPTION Modification of twelve ground material storage bins.

DATE INSTALLED 9/98

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		No VE	0.3	No VE	0.3
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

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

Total enclosure, dust suppression chemicals.

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

**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:

**NEW SOURCE REVIEW FORM B**

PTI Number: 06-06301 Facility ID: 0679000118

FACILITY NAME The Belden Brick Company

FACILITY DESCRIPTION Tunnel Kiln 1 Administrative Modification CITY/TWP Sugarcreek

Emissions Unit ID: P301

SIC CODE 3251 SCC CODE \_\_\_\_\_ EMISSIONS UNIT ID P201

EMISSIONS UNIT DESCRIPTION Modification of gas fired tunnel kiln vented to a dry scrubber and fabric filter.

DATE INSTALLED \_\_\_\_\_

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					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPS? 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?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**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 \_\_\_\_\_ NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**73 NEW SOURCE REVIEW FORM B**

PTI Number: 06-06301 Facility ID: 0679000118

FACILITY NAME The Belden Brick Company

FACILITY DESCRIPTION Tunnel Kiln 1 Administrative Modification CITY/TWP Sugarcreek

Emissions Unit ID: P301

SIC CODE 3251 SCC CODE \_\_\_\_\_ EMISSIONS UNIT ID P301

EMISSIONS UNIT DESCRIPTION Administrative Modification of Plant 3 Tunnel Kiln 1, a gas fired tunnel kiln vented to a dry scrubber and fabric filter.

DATE INSTALLED \_\_\_\_\_

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					
PM <sub>10</sub>					
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?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**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 \_\_\_\_\_ NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_