

Facility ID: 0616010007 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0616010007 Emissions Unit ID: P905 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P905 - Rotating Didion Drum and conveyors; replacing emissions unit P005	OAC rule 3745-31-05 (A)(3) (PTI# 06-06141 issued final on 8/8/00)	Emissions of a particulate matter (PM) shall not exceed 3.65 lb/hour from the stack; 4.56 TPY The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and 07 (B)(1). best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See II.A.2.a. below. Emissions of volatile organic compounds (VOC) shall not exceed 14.4 pounds per hour; 18.0 TPY. Emissions of carbon monoxide (CO) shall not exceed 12.0 pounds per hour; 15.0 TPY.
	OAC rule 3745-31-05(C) (Synthetic Minor to avoid Title V)	See II.A.2.b. below
	OAC rule 3745-17-07 (A)	Visible particulate emissions shall not exceed 20% opacity from the stack, except as specified by rule.
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a three minute average.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3)

2. Additional Terms and Conditions

- (a) The permittee shall minimize or eliminate visible particulate emissions of fugitive dust by employing best available control measures. These measures shall include, but not be limited to, the following:
 - i. The installation and use of hoods, fans and other equipment to adequately enclose, contain, capture and vent the fugitive dust;
 - ii. The collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. The maximum annual production rate for this emissions unit shall not exceed 30,000 tons of metal poured, based upon a rolling, 12-month summation of the production rates.

The permittee has existing data on which to base the 12-month total at the time this permit is issued.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3-8 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly 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 daily basis.
2. The permittee shall maintain monthly records of the following information:
 - a. The production rate for each month.
 - b. The rolling, 12-month summation of the production rates.

The permittee has existing data on which to base the 12-month total at the time this permit is issued

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

E. Testing Requirements

1. Compliance with the emissions limitations in sections II.A.1. and II.A.2. of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation:
Emissions of particulate matter (PM) shall not exceed 3.65 lbs/hour; 4.56 TPY.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the 3.65 lb/hour particulate emission limitation.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from
A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

Compliance with the 4.56 TPY particulate limit shall be demonstrated by multiplying the results of emissions testing above (in pounds per ton of metal poured) x the maximum production limitation of 30,000 tons per year x 0.0005 ton/lb.

Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity from the stack, except as specified by rule.

Applicable Compliance Method:

If required by Ohio EPA, compliance with the 20% opacity limit shall be determined using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

Emissions Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a three minute average.

Compliance Method:

If required by Ohio EPA, compliance with the 20% opacity limit shall be determined using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

For purposes of verifying compliance with the above visible emissions of fugitive dust requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows and roof monitors.

Emissions Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 14.4 pounds per hour; 18.0 TPY.

Applicable Compliance Method:

Compliance with the 14.4 lb VOC/ hour emission limitation shall be determined by a one time calculation using

the emissions factor from FIRE Version 6.22, Source Classification Codes and Emission Factor Listing For Criteria Air Pollutants, of 1.20 lb VOC per ton of metal poured, multiplied by the maximum hourly rate of this emissions unit in tons of metal poured per hour.

Compliance with the 18.0 TPY VOC emission limitation shall be determined by a one time calculation using the above emission factor x the maximum production limitation of 30,000 tons per year and 0.0005 ton/lb.

Emissions Limitation:

Emissions of carbon monoxide (CO) shall not exceed 12.0 pounds per hour; 15.0 TPY.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the 12.0 lb/hour carbon monoxide (CO) emission limitation.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

Compliance with the 15.0 TPY CO shall be demonstrated by multiplying the results of emissions testing above (in pounds per ton of metal poured) x the maximum production limitation of 30,000 tons per year and 0.0005 ton/lb.

Compliance with the rolling 12-month production rate limitation shall be demonstrated by the monitoring and recordkeeping in Section II.C.2. of this permit.

Compliance with the best available control technology requirements of OAC rule 3745-31-05 for visible emissions of fugitive dust shall be demonstrated by implementation of the control measures in II.A.2.a. of this permit and compliance with the 20% opacity limitation for visible particulate emissions of fugitive dust in accordance with II.E.3.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.