

Facility ID: 0630010005 Issuance type: Title V Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. None

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### b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B003 - 4.2 mmBtu/hr boiler;  
 F001 - screen;  
 P001 - tertiary crusher;  
 P002 - V2O5 dump hopper;  
 P003 - VOCL3 plant;  
 P004 - Bauer mill;  
 P006 - vanadium pentoxide grinding system;  
 P007 - primary and secondary crusher;  
 P012 - sample prep. area crushing and pulverizing;  
 P013 - cerium briquetting;  
 P901 - residue crushing equipment;  
 P902 - residue handling system;  
 Z001 - chemical plant finger crusher;  
 Z003 - roaster lime silo;  
 Z004 - 110 HP emergency generator;  
 Z005 - slag pile;  
 Z006 - plant wide material handling;  
 Z007 - large cold cleaner;  
 Z008 - small cold cleaner;  
 Z009 - mix station; and  
 Z010 - raw material screener.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

The following insignificant emissions units are located at this facility:

B003 - 4.2 mmBtu/hr boiler;  
 F001 - screen;  
 P001 - tertiary crusher;  
 P002 - V2O5 dump hopper;  
 P003 - VOCL3 plant;  
 P004 - Bauer mill;  
 P006 - vanadium pentoxide grinding system;  
 P007 - primary and secondary crusher;  
 P012 - sample prep. area crushing and pulverizing;  
 P013 - cerium briquetting;  
 P901 - residue crushing equipment;  
 P902 - residue handling system;  
 Z001 - chemical plant finger crusher;  
 Z003 - roaster lime silo;  
 Z004 - 110 HP emergency generator;  
 Z005 - slag pile;  
 Z006 - plant wide material handling;  
 Z007 - large cold cleaner;  
 Z008 - small cold cleaner;  
 Z009 - mix station; and  
 Z010 - raw material screener.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0630010005 Emissions Unit ID: P010 Issuance type: Title V Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. 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>  |
|--|--------------------------------------|---|
| electric arc furnace #2 controlled with a baghouse | OAC rule 3745-17-07(A)               | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.<br>See A.I.2.b below.<br>See A.I.2.a below.<br>33.6 lbs/hr of particulate emissions from furnace #1 (P011) and furnace #2 (P010), combined |
|  | OAC rule 3745-17-07(B)               |   |
|  | OAC rule 3745-17-08(B)               |   |
|  | OAC rule 3745-17-11(B)               |   |

**2. Additional Terms and Conditions**

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08 the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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**II. Operational Restrictions**

- 1. The pressure drop across each compartment of the baghouse shall be maintained within the range of 1.2 to 9.0 inches of water, while the emissions unit is in operation.

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**III. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall perform daily checks, while the equipment is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit and any visible fugitive particulate emissions. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log.
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
- 2. The permittee shall properly operate, and maintain equipment to monitor the pressure drop across each compartment of 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 each compartment of the baghouse on a once per shift basis.

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**IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible stack and/or abnormal fugitive particulate emissions were observed from this emissions unit and (b) describe any 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) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each compartment of the baghouse did not comply with the allowable range specified in section A.II.1. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), and the procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:
 

33.6 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after permit issuance and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 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.
  - d. The test(s) shall be conducted while this emissions unit and emissions unit P011 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0630010005 Emissions Unit ID: P010 Issuance type: Title V Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. 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> |
|--|---|--------------------------------------|--|
|--|---|--------------------------------------|--|

**2. Additional Terms and Conditions**

- 1. None

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0630010005 Emissions Unit ID: P011 Issuance type: Title V Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>   |
|--|--------------------------------------|--|
| electric arc furnace #1 controlled with a baghouse | OAC rule 3745-17-07(A)               | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
|  | OAC rule 3745-17-07(B)               | See A.I.2.b below.   |
|  | OAC rule 3745-17-08(B)               | See A.I.2.a below.   |
|  | OAC rule 3745-17-11(B)               | 33.6 lbs/hr of particulate emissions from furnace #1 (P011) and furnace #2 (P010), combined                                      |

**2. Additional Terms and Conditions**

- a. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08 the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- b. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

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**II. Operational Restrictions**

1. The pressure drop across each compartment of the baghouse shall be maintained within the range of 1.2 to 9.0 inches of water, while the emissions unit is in operation.

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform daily checks, while the equipment is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit and any visible fugitive particulate emissions. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log.
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall properly operate, and maintain equipment to monitor the pressure drop across each compartment of 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 each compartment of the baghouse on a once per shift basis.

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**IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible stack and/or abnormal fugitive particulate emissions were observed from this emissions unit and (b) describe any 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) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each compartment of the baghouse did not comply with the allowable range specified in section A.II.1. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), and the procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:
 

33.6 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after permit issuance and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 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.
  - d. The test(s) shall be conducted while this emissions unit and emissions unit P010 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0630010005 Emissions Unit ID: P011 Issuance type: Title V Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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> |
|---|--------------------------------------|--|
| 2. <b>Additional Terms and Conditions</b>     |                                      |  |
| 1. None                                       |                                      |  |

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**II. Operational Restrictions**

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 0630010005 Emissions Unit ID: P014 Issuance type: Title V Proposed Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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> |
|---|---|--|
| multiple hearth roaster controlled with a baghouse and a dry scrubber for SO2 | OAC rule 3745-31-05(A)(3) (PTI 06-5869) | See A.I.2.a below.                                       |

0.010 grain of particulate emissions per dry standard cubic foot of exhaust gases

no visible particulate emissions

10.5 tpy of particulate emissions

8.9 lbs/hr of nitrogen oxides (NOx)

39.0 tpy of NOx

8.9 lbs/hr of organic compounds (OC)

39.0 tpy of OC

The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21.

OAC rule 3745-17-07(A)

See A.I.2.b below.

OAC rule 3745-17-07(B)

See A.I.2.c below.

OAC rule 3745-17-08(B)

See A.I.2.d below.

OAC rule 3745-17-11(B)

See A.I.2.e below.

OAC rule 3745-18-06(E)

See A.I.2.f below.

40 CFR Part 52.21

78.1 lbs/hr of sulfur dioxide (SO2)

342.1 tpy of SO2

78.0 lbs/hr of carbon monoxide (CO)

341.7 tpy of CO

OAC rules 3745-21-08(B) and 3745-23-06(B) See A.I.2.g below.

**2. Additional Terms and Conditions**

- a. The permittee shall employ best available control measures on the multiple hearth roaster for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee shall maintain enclosures and vent emissions to a dry scrubber and baghouse which are capable of meeting the applicable requirements. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. The visible particulate emission limitations required by OAC rule 3745-17-07 are less stringent than the visible particulate emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- c. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- d. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08 the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- e. The particulate emission limitation required by OAC rule 3745-17-11 is less stringent than the particulate emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- f. The SO2 emission limitation required by OAC rule 3745-18-06 is equivalent to the SO2 emission limitation established pursuant to the requirements specified in 40 CFR Part 52.21.
- g. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 06-5869.

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**II. Operational Restrictions**

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.

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**III. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit and any

visible fugitive particulate emissions. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> from this emissions unit in units of the applicable standard (lbs/hr). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13. Prior to commencing operation of this emissions unit, the permittee shall submit information detailing the proposed location of the sampling site(s) in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub> monitoring system including, but not limited to, parts per million SO<sub>2</sub> on an instantaneous (one-minute) basis, emissions of SO<sub>2</sub> in units of the applicable standard in the appropriate averaging period (i.e., in lbs/hr, in lbs/hr as a rolling, 3-hour average, and in tons per year), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

3. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous SO<sub>2</sub> monitoring system designed to ensure continuous valid and representative readings of SO<sub>2</sub>. 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> monitoring system must be kept on site and available for inspection during regular office hours.
4. 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 once per shift basis.

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#### IV. Reporting Requirements

1. Pursuant to 40 CFR Part 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all rolling, 3-hour average SO<sub>2</sub> values in excess of the applicable limit of 78.1 lbs/hr. These reports shall also contain the total SO<sub>2</sub> emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting any continuous SO<sub>2</sub> 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 date, time, reason, and corrective action(s) taken for each time period of 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 January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
3. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible stack and/or abnormal fugitive particulate emissions were observed from this emissions unit and (b) describe any 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) by January 31 and July 31 of each year and shall cover the previous 6-month period.
5. The permittee shall also submit annual reports that specify the total particulate, NO<sub>x</sub>, OC, SO<sub>2</sub>, and CO emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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#### V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
0.010 grain of particulate emissions per dry standard cubic foot of exhaust gases  
Applicable Compliance Method:  
Compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.
- b. Emission Limitation:  
10.5 tpy of particulate emissions  
Applicable Compliance Method:  
Compliance shall be determined using the following equation:  
 $(\text{tested emission rate, in lbs/hr}) * (\text{actual hours of operation, in hrs/yr}) * 0.0005 \text{ ton/lb} = \text{tpy}$
- c. Emission Limitation:  
no visible particulate emissions  
Applicable Compliance Method:  
If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 22.
- d. Emission Limitation:  
78.1 lbs/hr of SO<sub>2</sub>  
Applicable Compliance Method:  
Compliance shall be determined based upon the continuous emissions monitoring records required pursuant to section A.III.2. If required, compliance shall also be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.
- e. Emission Limitation:  
342.1 tpy of SO<sub>2</sub>  
Applicable Compliance Method:  
Compliance shall be determined based upon the continuous emissions monitoring records required pursuant to section A.III.2.
- f. Emission Limitation:  
8.9 lbs/hr of NO<sub>x</sub>  
Applicable Compliance Method:  
Compliance may be determined by using the emission factor (as supplied by the manufacturer) of 0.04 lb/min of NO<sub>x</sub> and multiplying by 60 min/hr to obtain the hourly emission rate. If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.
- g. Emission Limitation:  
39.0 tpy of NO<sub>x</sub>  
Applicable Compliance Method:  
Compliance shall be determined using the following equation:  
 $\text{lbs/hr (as calculated or from test data)} * (\text{actual hours of operation, in hrs/yr}) * 0.0005 \text{ ton/lb} = \text{tpy}$
- h. Emission Limitation:  
78.0 lbs/hr of CO  
Applicable Compliance Method:  
Compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.
- i. Emission Limitation:  
341.7 tpy of CO

## Applicable Compliance Method:

Compliance shall be determined using the following equation:

$$(\text{tested emission rate, in lbs/hr}) * (\text{actual hours of operation, in hrs/yr}) * 0.0005 \text{ ton/lb} = \text{tpy}$$

## j. Emission Limitation:

8.9 lbs/hr of OC

## Applicable Compliance Method:

Compliance may be determined using the following equation:

$$0.107 \text{ lb of OC/ton of feed} * 4.17 \text{ tons/hr} = 0.45 \text{ lb/hr,}$$

where 0.107 lb of OC/ton of feed is derived from samples of the raw material taken by the permittee. If required, compliance with this emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

## k. Emission Limitation:

39.0 tpy of OC

## Applicable Compliance Method:

Compliance shall be determined using the following equation:

$$0.45 \text{ lb/hr} * (\text{actual hours of operation}) * 0.0005 \text{ ton/lb} = \text{tpy}$$

2. Within 60 days of the effective date of this permit, the permittee shall conduct certification tests of the continuous SO<sub>2</sub> monitoring system pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office within 30 days after the test is completed. Certification of the continuous SO<sub>2</sub> monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The particulate and SO<sub>2</sub> emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration. The CO emission testing shall be conducted within 3 months after issuance of this permit and within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitations for particulates, SO<sub>2</sub>, and CO.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations: for particulates, Methods 1 through 4 and 5 of 40 CFR Part 60, Appendix A, for SO<sub>2</sub>, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A, and for CO, Methods 1 through 4 and 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.
  - d. 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 appropriate Ohio EPA District Office or local air agency.
  - e. The pressure drop across the baghouse shall be monitored and recorded during the particulate emission tests.  
Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 or local air agency's refusal to accept the results of the emission test(s).  
  
Personnel from the appropriate Ohio EPA District Office or local air agency 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0630010005 Emissions Unit ID: P014 Issuance type: Title V Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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> |
|---|--------------------------------------|--|
| multiple hearth roaster controlled with a baghouse and a dry scrubber for SO2 |                                      |  |

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (P014) 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: Toluene

TLV (ug/m3): 754,000

Maximum Hourly Emission Rate (lbs/hr): 0.26

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0737

MAGLC (ug/m3): 17,952

Pollutant: Sulfuric Acid

TLV (ug/m3): 1,000

Maximum Hourly Emission Rate (lbs/hr): 0.96

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.72

MAGLC (ug/m3): 23.8

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.

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 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.

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None