



Environmental  
Protection Agency

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

5/24/2010

George MUCKLE  
ASHTABULA IRON AND METAL  
PO BOX 800  
ASHTABULA, OH 44005

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0204010248  
Permit Number: P0106005  
Permit Type: Initial Installation  
County: Ashtabula

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
Yes	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ASHTABULA IRON AND METAL**

Facility ID: 0204010248  
Permit Number: P0106005  
Permit Type: Initial Installation  
Issued: 5/24/2010  
Effective: 5/24/2010  
Expiration: 5/24/2020





Division of Air Pollution Control
Permit-to-Install and Operate
for
ASHTABULA IRON AND METAL

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## Authorization

Facility ID: 0204010248  
Application Number(s): A0039001  
Permit Number: P0106005  
Permit Description: Installation of copper recycling process  
Permit Type: Initial Installation  
Permit Fee: \$400.00  
Issue Date: 5/24/2010  
Effective Date: 5/24/2010  
Expiration Date: 5/24/2020  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ASHTABULA IRON AND METAL  
WEST AVE & WEST 30TH  
ASHTABULA, OH 44004

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 43087  
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Chris Korleski  
Director

## Authorization (continued)

Permit Number: P0106005  
Permit Description: Installation of copper recycling process

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>F004</b>
Company Equipment ID:	TURNINGS CRUSHER
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

## **B. Facility-Wide Terms and Conditions**

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

## **C. Emissions Unit Terms and Conditions**



1. F004, TURNINGS CRUSHER

Operations, Property and/or Equipment Description:

The copper reclamation system is located in one room consisting of a hydraulic sheer, hammer mill, cyclone air separation system and an area for the preparation of waste asbestos for disposal. The room air is evacuated into two HEPA filter negative air machines (NAMs) located within and exhausting into the processing room. The filters will maintain negative air pressure within the room.

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The permittee shall use HEPA filters that are certified to be at least 99.995 percent efficient for 0.3 micron particles.  Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.  Particulate emissions of size 0.3 microns or smaller shall not exceed 0.0075 lb/hour and 0.033 ton per year.  Emissions of asbestos shall not exceed 0.0006 lb/hour and 0.003 ton per year.  See b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-20-12(B)(2)	The permittee shall comply with any section of this rule which is determined to be applicable to this emissions unit.  See b)(2)a and b)(2)b.
c.	40 CFR Part 61, Subpart M	The permittee shall comply with any section of this rule which is determined to be applicable to this emissions unit.  See b)(2)a and b)(2)b.
d.	40 CFR 61.01-61.19 Subpart A, General Provisions	The permittee shall comply with all the applicable sections of subpart A.
e.	OAC rule 3745-17-11(B) OAC rule 3745-17-07(A)	The requirements established pursuant to these rules are less stringent than the requirements specified in OAC rules 3745-20-12, 3745-31-05(A)(3) and 40 CFR 61 subpart M.

(2) Additional Terms and Conditions

- a. The Best Available Technology determination for all activities associated with this emissions unit shall be:
  - i. The permittee shall install, operate and maintain this emissions unit, all associated equipment and the room in which the equipment is located as described in the application.
  - ii. The permittee shall maintain the processing room under negative pressure at a minimum of -0.02 inches of water column at all times when any part of the process is in operation including during periodic cleaning/decontamination of the processing room and equipment.
  - iii. The permittee shall install, use, operate and maintain both HEPA filters whenever the hydraulic shear, hammer mill, waste handling or cleaning of the room or equipment is in operation. Bypass devices may be used only during upset or emergency conditions and then only for so long as it takes to shut down the operation generating the particulate asbestos material. The HEPA filters shall be as follows:
    - (a) Ensure that the airflow permeability, as determined by ASTM Method D737-75, does not exceed 9 m<sup>3</sup>/min/m<sup>2</sup> (30 ft<sup>3</sup>/min/ft<sup>2</sup>) for woven fabrics or 11 m<sup>3</sup>/min/m<sup>2</sup> (35 ft<sup>3</sup>/min/ft<sup>2</sup>) for felted fabrics;
    - (b) Ensure that felted fabric weighs at least 475 grams per square meter (14 ounces per square yard) and is at least 1.6 millimeters (one-sixteenth inch) thick throughout; and
    - (c) Avoid the use of synthetic fabrics that contain fill yarn other than that which is spun.



- iv. The HEPA filters shall be located within the processing room.
  - v. The permittee shall adequately wet the RACM during the use of the hammer mill and asbestos waste preparation.
  - vi. Both HEPA filters shall provide for easy inspection for faulty bags.
  - vii. There shall be no visible particulate emissions from the HEPA filters.
  - viii. Visible fugitive emissions shall not exceed 0% opacity, as a 3-minute average.
- b. The permittee shall comply with all applicable rules, including the following:

OAC rule 3745-20-03	Notification prior to demolition or renovation
40 CFR 61.145(b)	Notification prior to demolition or renovation
OAC rule 3745-20-04	Demolition and renovation procedures for asbestos emission control
40 CFR 61.145(c)	Demolition and renovation procedures for asbestos emission control
OAC rule 3745-20-05	Standard for asbestos waste handling
40 CFR 61.149(d)	Waste transport by a vehicle to a disposal site
40 CFR 61.150	Standard for waste disposal for manufacturing, fabricating, demolition, renovation and spraying activities
OAC rule 3745-20-12	Air Cleaning
40 CFR 61.152	Air Cleaning
OAC rule 3745-20-06	Dispose of all asbestos containing waste at an approved landfill which meets these specifications.
40 CFR 61.154	Dispose of all asbestos containing waste at an approved landfill which meets these specifications.

- c) Operational Restrictions
- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The acceptable range for the pressure drop across the HEPA filters shall be based upon the manufacturer's specifications, which is 4 inches mercury with a fluctuation of no more than 3 inches mercury positive or negative, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s).

- (2) 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 both HEPA filters' exhaust. 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. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the main processing room. 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. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (4) The permittee shall maintain certification on-site that both HEPA filters are at least 99.995% efficient at 0.03 micron and comply with the specifications in b)(2)a.iii and vi.
- (5) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the main processing room when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. all three-hour blocks of time during which the difference in pressure between the main processing room and the surrounding areas is not maintained at or above the minimum pressure differential of 0.02 inches of water, as a three-hour average; and

- b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

e) Reporting Requirements

- (1) The following information shall be provided within 90 days of the initial startup date. Any changes to the information provided shall be provided to the Director, postmarked or delivered, within 30 days after the change:
  - a. the certified efficiency of the HEPA filter used to control emissions.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. These reports may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Northeast District Office.
- (3) The permittee shall identify the following information in the annual permit evaluation report:
  - a. all days during which any visible particulate emissions were observed from the HEPA filters' exhaust; and
  - b. any corrective actions taken to eliminate the visible particulate emissions.
  - c. all days during which any visible emissions of fugitive dust were observed from the main processing room; and
  - d. any corrective actions taken to eliminate the visible fugitive emissions.
  - e. each period of time (start time and date, and end time and date) when the pressure drop across the HEPA filters was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
  - f. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the HEPA filters; and
  - g. all three-hour blocks of time, when the emissions unit was in operation, during which the main processing room was not maintained at the minimum pressure differential of 0.02 inches of water.

f) Testing Requirements

- (1) Compliance with the emission limitations and work practice standards in section b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from the HEPA filters shall not exceed 0% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate 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).

b. Emission Limitation:

Visible fugitive emissions shall not exceed 0% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

Particulate emissions of size 0.3 microns or smaller shall not exceed 0.0075 lb/hour and 0.033 ton per year.

Emissions of asbestos shall not exceed 0.0006 lb/hour and 0.003 ton per year.

Applicable Compliance Method:

Compliance with these limitations is based upon compliance with the emissions limitations/work practice standards specified in this permit and in the permit application.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed 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) or using any other test method deemed appropriate by the Director.

d. Emission Limitations/ Work Practice Standards:

The permittee shall install, operate and maintain this emissions unit, all associated equipment and the room in which the equipment is located as described in the application.

The permittee shall use HEPA filters that are certified to be at least 99.995 percent efficient for 0.3 micron particles.

The HEPA filters shall be as follows:

- i. Ensure that the airflow permeability, as determined by ASTM Method D737-75, does not exceed  $9 \text{ m}^3/\text{min}/\text{m}^2$  ( $30 \text{ ft}^3/\text{min}/\text{ft}^2$ ) for woven fabrics or  $11 \text{ m}^3/\text{min}/\text{m}^2$  ( $35 \text{ ft}^3/\text{min}/\text{ft}^2$ ) for felted fabrics;
- ii. Ensure that felted fabric weighs at least 475 grams per square meter (14 ounces per square yard) and is at least 1.6 millimeters (one-sixteenth inch) thick throughout; and
- iii. Avoid the use of synthetic fabrics that contain fill yarn other than that which is spun.

Applicable Compliance Method:

The permittee shall maintain proper documentation on-site to certify compliance with these requirements.

- e. Emission Limitation:

The permittee shall maintain the processing room under negative pressure at a minimum of -0.02 inches of water column at all times when any part of the process is in operation and/or during periodic cleaning/decontamination of the processing room and equipment.

Applicable Compliance Method:

Compliance with these limitations is based upon monitoring and record keeping requirements specified in d)(5).

- g) Miscellaneous Requirements

- (1) None.