



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: PERMIT TO INSTALL DIRECT FINAL  
PORTAGE COUNTY  
Application No: 16-1914**

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
X	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED

**DATE:** May 5, 1999

Harbison-Walker Refractories Company  
John Stock  
PO Box 490  
Windham, OH 44288

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA  
AKRON REGIONAL AIR QUALITY MGNT



AGENCY

**Permit To Install**

**Issue Date: May 5, 1999**

**Terms and Conditions**

**Effective Date: May 5, 1999**

**DIRECT FINAL OF PERMIT TO INSTALL 16-1914**

Application Number: 16-1914

APS Premise Number: 1667090000

Permit Fee: **\$2200**

Name of Facility: Harbison-Walker Refractories Company

Person to Contact: John Stock

Address: PO Box 490  
Windham, OH 44288

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

**9686 East Center Street  
Windham, OHIO**

Description of proposed emissions unit(s):

**RAW MATERIAL STORAGE PILES, ROTARY DRYER, AND CRUSHER AND SCREENING OPERATION.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

\_\_\_\_\_  
Director

## **Part I - GENERAL TERMS AND CONDITIONS**

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

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

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.14 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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

## **3. Risk Management Plans**

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

## **4. Title IV Provisions**

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

## **5. Severability Clause**

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

## **6. General Requirements**

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

## **7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions

designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
  - i. Compliance certifications shall be submitted on an annual basis unless the applicable requirement specifies more frequent submissions.
  - ii. Compliance certifications shall include the following:
    - aa. An identification of each term or condition of this permit that is the basis of the certification.
    - ab. The permittee's current compliance status.
    - ac. Whether compliance was continuous or intermittent.
    - ad. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - ae. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

## **10. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

## **11. Title V Permit To Operate Application**

Pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit.

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

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request,

the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed

prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	23.2
PM <sub>10</sub>	7.0
NO <sub>x</sub>	5.7
CO	4.8
OC	0.63

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

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

None.

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

None.

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
13,000,000 Btu/hr natural gas fired Hardinge rotary dryer with a baghouse as control	OAC rule 3745-17-07(A)	Visible emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11	3.25 pounds of particulate matter (PM) per hour, including natural gas combustion emissions (See A.I.2.b below.)  1.6 pounds of particulate matter with an aerodynamic diameter of less than 10 microns (PM-10) per hour, including natural gas combustion emissions (See A.I.2.b below.)

**2. Additional Terms and Conditions**

- 2.a. The rotary dryer was manufactured in 1947 and is not subject to 40 CFR Part 60, subpart UUU.
- 2.b. Harbison-Walker Refractories Company has accepted this limit which is more stringent than OAC rule 3745-17-11 as federally enforceable in order to avoid triggering PSD permitting.

## **II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation or the range established during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
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 the stack serving this emissions unit. 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.

## **IV. 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 semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving 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.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

## **V. Testing Requirements**

1. 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 90 days after initial startup.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for PM, Methods 1-4 and 5 of 40 CFR Part 60, Appendix A and for PM-10, Methods 1-4 of 40 CFR Part 60, Appendix A and Method 201 or 201A 40 CFR Part 51, Appendix M.
  - 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.
2. 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).
3. 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.
4. 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 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.
5. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation

Visible emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

b. Emission Limitation

3.25 pounds of PM per hour, including natural gas combustion emissions

Applicable Compliance Method

Compliance shall be demonstrated using US EPA Reference Methods 1-5 of 40 CFR Part 60, Appendix A as required in sections A.V.1 through A.V.4 of these terms and conditions.

c. Emission Limitation

1.6 pounds PM<sub>10</sub> per hour, including natural gas combustion emissions

Applicable Compliance Method

Compliance shall be demonstrated using US EPA Reference Methods 1-4 of 40 CFR Part 60 , Appendix A and Method 201 or 201A 40 CFR Part 51, Appendix M as required in sections A.V.1 through A.V.4 of these terms and conditions.

**VI. Miscellaneous Requirements**

None.

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
13,000,000 Btu/hr natural gas fired Hardinge rotary dryer with a baghouse as control	OAC rule 3745-31-05	14.2 tons of PM per year, including natural gas combustion emissions  7.0 tons of PM <sub>10</sub> per year, including natural gas combustion emissions  The rotary dryer shall only be fired with natural gas.  Natural Gas Combustion Emissions from the rotary dryer shall not exceed the following:  1.3 pounds of nitrogen oxides (NO <sub>x</sub> ) per hour  5.7 tons of NO <sub>x</sub> per year  1.1 pounds of carbon monoxide (CO) per hour  4.8 tons of CO per year  0.14 pound of organic compounds (OC) per hour  0.63 ton of OC per year

**2. Additional Terms and Conditions**

2.a. None.

**II. Operational Restrictions**

None.

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

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

1.3 pounds of NO<sub>x</sub> per hour

Applicable Compliance Method

Multiply the nitrogen oxides emissions factor of 100 pound(s) of nitrogen oxides emissions per million standard cubic feet of natural gas fired by the maximum hourly million standard cubic feet of natural gas fired (AP-42 Table 1.4-1 2/98).

b. Emission Limitation

5.7 tons of NO<sub>x</sub> per year

Applicable Compliance Method

Multiply the nitrogen oxides emissions factor of 100 pound(s) of nitrogen oxides emissions per million standard cubic feet of natural gas fired by the maximum yearly million standard cubic feet of natural gas fired (AP-42 Table 1.4-1 2/98), then divided by 2000.

c. Emission Limitation

1.1 pounds of CO per hour

Applicable Compliance Method

Multiply the carbon monoxide emissions factor of 84 pound(s) of carbon monoxide emissions per million standard cubic feet of natural gas fired by the maximum hourly million standard cubic feet of natural gas fired (AP-42 Table 1.4-1 2/98).

d. Emission Limitation

4.8 tons of CO per year

Applicable Compliance Method

Multiply the carbon monoxide emissions factor of 84 pound(s) of carbon monoxide emissions per million standard cubic feet of natural gas fired by the maximum yearly million standard cubic feet of natural gas fired (AP-42 Table 1.4-1 2/98), then divided by 2000.

e. Emission Limitation

0.14 pound of OC per hour

Applicable Compliance Method

Multiply the organic compounds emissions factor of 11 pound(s) of organic compounds emissions per million standard cubic feet of natural gas fired by the maximum hourly million standard cubic feet of natural gas fired (AP-42 Table 1.4-2 7/98).

f. Emission Limitation

0.63 ton of OC per year

Applicable Compliance Method

Multiply the organic compounds emissions factor of 11 pound(s) of organic compounds emissions per million standard cubic feet of natural gas fired by the maximum yearly million standard cubic feet of natural gas fired (AP-42 Table 1.4-2 7/98), then divided by 2000.

g. Emission Limitation

14.2 tons of PM per year, including natural gas combustion emissions

Applicable Compliance Method

Multiply the results from the compliance testing required in sections A.V.1 through A.V.4 of these terms and conditions by 8760 hours per year, then divided by 2000.

h. Emission Limitation

7.0 tons of PM<sub>10</sub> per year, including natural gas combustion emissions

Applicable Compliance Method

Multiply the results from the compliance testing required in sections A.V.1 through A.V.4 of these terms and conditions by 8760 hours per year, then divided by 2000.

**VI. Miscellaneous Requirements**

None.

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Barmac 7000 crusher, multi-deck screen, and associated conveying equipment with a baghouse as control	OAC rule 3745-17-07(A)	See A.I.2.b below.
	OAC rule 3745-17-11	See A.I.2.b below.
	40 CFR Part 60, subpart OOO	<p>No permittee shall cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility (See A.I.2.c below.) any stack emissions which:</p> <ol style="list-style-type: none"> <li>a. Contain particulate matter in excess of 0.05 g/dscm; and</li> <li>b. Exhibit greater than 7 percent opacity (See A.I.2.d below).</li> </ol> <p>The building enclosing the affected facility or facilities shall comply with the following emission limits:</p> <ol style="list-style-type: none"> <li>a. No permittee shall cause to be discharged into the atmosphere from any building enclosing transfer point on a conveyor belt or any other affected facility any visible fugitive emissions except emissions from a vent as defined in Section 60.671 of 40 CFR Part 60, subpart OOO.</li> </ol>

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**Harbison-Walker Refractories Company**

PTI Application: **16-1914**

**May 5, 1999**

Facility ID: **1667090000**

Emissions Unit ID: **P902**

**2. Additional Terms and Conditions**

- 2.a. This facility is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07(B) and 3745-17-08 do not apply to this emissions unit.
- 2.b. The emissions limit based on this applicable rule is less stringent than the limit established pursuant to 40 CFR Part 60, subpart OOO.
- 2.c. An affected facility is any piece of equipment that is designated in Section 60.670(a)(1) of 40 CFR Part 60, subpart OOO as subject to the regulation (i.e., each crusher, grinding mill, screening operation etc.).
- 2.d. Compliance with the stack and vent emission limitations shall be achieved on and after the date on which the performance test required to be conducted by Section 60.8 of 40 CFR Part 60, subpart A is completed.

**II. Operational Restrictions**

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation or the range established during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any building opening serving this emissions unit and for any visible particulate emissions from the stack and vents serving this emissions unit. 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.

#### **IV. 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 semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving 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.
3. The permittee of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the emission standards in Section A.I.1 of these terms and conditions, including reports of opacity observations made using Method 9 of 40 CFR Part 60, Appendix A to demonstrate compliance with 7 percent opacity and reports of observations using Method 22 of 40 CFR Part 60, Appendix A to demonstrate compliance with no visible fugitive emissions to the atmosphere.
4. A notification of the actual date of initial startup of each affected facility shall be submitted to the Administrator. For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the permittee to the Administrator. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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

1. 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 60 days of achieving the maximum production rate, but not later than 180 days after initial startup.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulates, the stack and vent opacity emission limitations, and the visible fugitive emission limitation for the building enclosure.

- c. The following test method(s) shall be employed to demonstrate compliance:
    - i. for the stack allowable mass emission rate: for particulates, Methods 1-4 and 5 or 17 of 40 CFR Part 60, Appendix A, with the following additions:
      - aa. The sample volume shall be at least 1.70 dscm (60 dscf).
      - ab. For Method 5, if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters.
      - ac. If the gas stream is above ambient temperature, the sample probe and filter may be operated at a temperature high enough, but no higher than 121 degrees Celsius (250 degree Fahrenheit), to prevent water condensation on the filter.
    - ii. for the stack opacity emission limitation: for particulates, Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A.
    - iii. for the visible fugitive emission limitation from the building enclosure: for particulates, Method 22 of 40 CFR Part 60, Appendix A with the following additions:
      - aa. The performance test shall be conducted while all affected facilities inside the building are operating.
      - ab. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.
  - 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.
2. 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).
  3. 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.

4. 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 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.
5. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

No visible fugitive emission

Applicable Compliance Method

Compliance shall be demonstrated using US EPA Method 22 of 40 CFR Part 60, Appendix A as required in sections A.V.1 through A.V.4 of these terms and conditions

- b. Emission Limitation

0.05 g/dscm for stack emissions

Applicable Compliance Method

Compliance shall be demonstrated using US EPA Reference Methods 1-5 of 40 CFR Part 60, Appendix A as required in sections A.V.1 through A.V.4 of these terms and conditions.

- c. Emission Limitation

7% opacity for stack emissions

Applicable Compliance Method

Compliance shall be demonstrated using US EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures in Section 60.11 of 40 CFR Part 60, subpart A as required in sections A.V.1 through A.V.4 of these terms and conditions..

## **VI. Miscellaneous Requirements**

None.

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Barmac 7000 crusher, multi-deck screen, and associated conveying equipment with a baghouse as control	OAC rule 3745-31-05	<p>1.47 pounds of particulate matter (PM) per hour for stack emissions from the baghouse.</p> <p>6.4 tons of PM per year for stack emissions from the baghouse.</p> <p>Visible particulate emissions from the truck dumping of nonmetallic minerals into the feed hopper shall not exceed twenty per cent opacity, as a three-minute average (Emissions from the truck dumping into the feed hopper are included in the emissions for storage piles under the load-out operations).</p>

**2. Additional Terms and Conditions**

- 2.a. None.

**II. Operational Restrictions**

None.

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

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

1. Emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

Visible particulate emissions from the truck dumping of nonmetallic minerals into the feed hopper shall not exceed twenty per cent opacity, as a three-minute average

Applicable Compliance Method

OAC rule 3745-17-03(B)(3)

- b. Emission Limitation

1.47 pounds of PM per hour for stack emissions from the baghouse.

Applicable Compliance Method

Compliance shall be demonstrated using US EPA Reference Methods 1-5 of 40 CFR Part 60, Appendix A as required in sections A.V.1 through A.V.4 of these terms and conditions.

- c. Emission Limitation

6.4 tons of PM per year for stack emissions from the baghouse.

Applicable Compliance Method

Multiply the results from the compliance testing required in sections A.V.1 through A.V.4 of these terms and conditions by 8760 hours per year, then divided by 2000.

**VI. Miscellaneous Requirements**

None.

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
load-in of storage piles by railcar with two baghouses as control for transfer points on the belt conveyors	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11	0.16 pound of particulate matter (PM) per hour for the stack emissions from both the baghouses combined

2. **Additional Terms and Conditions**

- 2.a. Harbison-Walker Refractories Company has accepted this limit which is more stringent than OAC rule 3745-17-11 as federally enforceable in order to avoid triggering PSD permitting.

**II. Operational Restrictions**

1. The pressure drop across each baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation or the range established during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across each 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 baghouse on a daily basis.

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 the stacks serving this emissions unit. 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.

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

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across either baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving 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.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation  
20% opacity as a six-minute average, except as provided by rule  
  
Applicable Compliance Method  
OAC rule 3745-17-03(B)(1)

b. Emission Limitation

0.16 pound of PM per hour

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and recording of the pressure drop across the baghouse as required in Section A.III.1. Stack testing may be required in the future in accordance with the procedures and test method(s) in OAC rule 3745-17-03(B)(10).

**VI. Miscellaneous Requirements**

None.

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
load-in and load-out of storage piles by truck, front-end loader, or railcar (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05	2.6 tons or PM per year (combined emissions from load-in, load-out, and wind erosion from all storage piles) See A.2.g below.  no visible emissions except for one minute in any hour  best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c and A.2.f)
wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05	no visible emissions except for one minute in any hour  No raw material shall extend outside of the enclosures for the storage piles.  best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d through A.2.f)

**2. Additional Terms and Conditions**

- 2.a. The storage piles that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

Storage Pile 1 - 6

- 2.b. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to enclose the storage piles inside a three sided shed with a roof and dividers between the storage piles for load-in by truck and front-end loader and to control each transfer point on the belt conveyor with a baghouse and to partial enclose each belt conveyor for load-in by railcar. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c. Other control measure(s) (i.e., treating the load-in materials with water and/or any other suitable dust suppression chemicals) shall be employed for each load-in and load-out of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that other control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of other control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- 2.d. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to enclose the storage piles inside a three sided shed with a roof and dividers between the storage piles to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e. Other control measure(s) (i.e., treating each storage pile with water and/or any other suitable dust suppression chemicals) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that other control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of other control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

- 2.g. The tpy limitation was established for PTI purposes to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

**II. Operational Restrictions**

None.

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

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	weekly

- 2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
all	weekly

- 3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
all	weekly

- 4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- 5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

- 6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

7. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and,
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and,
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition B.2.b.

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

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
  
2.6 tpy PM

Applicable Compliance Method:

Total Emissions = load-in + load-out + wind erosion

Load-in/load-out: multiply the RACM derived emission factor (RACM 2.1.2, equation 3) of 0.006 pound of particulate emissions per ton of material loaded by the maximum yearly tons of material loaded in and by the maximum yearly tons of material loaded out.

Wind erosion: multiply the RACM derived emission factor (RACM 2.1.2, equation 4) of 0 pound of particulate emissions per ton material stored the maximum tons of material stored.

b. Emission Limitation:

no visible emissions except for one minute in any hour

Applicable Compliance Method:

Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 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)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

**VI. Miscellaneous Requirements**

None.