☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install: **08-04768**

A. Source Description

Ritchie Bros Auctioneers (America) Inc., 0812090591, is a new facility proposed to be located in Clark County. The company is a large global auctioneer of equipment and machinery. Essentially, the company takes consigned equipment, such as construction and farm equipment, and refurbishes them by pressure washing (no emissions), abrasive blasting and painting.

Ritchie Bros Auctioneers has submitted a Permit to Install application for the installation of an abrasive blasting operation and a paint booth. The abrasive blasting operation will occur in a completely enclosed booth. Particulate emissions will be vented to a baghouse with an outlet grain loading of 0.02 gr/dscf. Blasting garnet will also be recycled in the booth via a recovery conveyor system located under the booth. Equipment painting will occur in a spray booth with dry filters.

B. Facility Emissions and Attainment Status

The facility is proposed to be located in Clark County, which is attainment for all major criteria pollutants except ozone and PM2.5, which are classified as basic non-attainment. Potential facility-wide emissions are 199 tons/yr VOC and 37.5 tons/yr particulate emissions (PE).

C. Source Emissions

The facility consists of 2 emissions units, an abrasive blasting operation (P001) and a paint booth (K001). Potential emissions are 199 tons/yr VOC from K001 and 37.5 tons/yr PE from P001.

D. Conclusion

The terms and conditions in this Synthetic Minor Permit to Install will limit the VOC emissions to 51 TPY. This is less than 100 TPY, which is the major source threshold for VOC with respect to Title V and New Source Review. Potential emissions have been limited through coating usage restrictions and through the inclusion of appropriate monitoring, record keeping and reporting requirements.

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: DRAFT PERMIT TO INSTALL
CLARK COUNTY
Application No: 08-04768
Fac ID: 0812090591

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 8/3/2006

Ritchie Bros. Auctioneers (America) Inc.
Tex Mahler
3901 Faulkner Dr.
Lincoln, NE 68516-0000

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

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$700** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **RAPCA** **Miami Valley Regional Planning Commission** **IN**

DRAFT PERMIT TO INSTALL 08-04768

Application Number: 08-04768

Facility ID: 0812090591

Permit Fee: **To be entered upon final issuance**

Name of Facility: Ritchie Bros. Auctioneers (America) Inc.

Person to Contact: Tex Mahler

Address: 3901 Faulkner Dr.
Lincoln, NE 68516-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:
200 Ritchie Rd.
South Vienna, Ohio

Description of proposed emissions unit(s):
Paint booth and abrasive booth.

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. 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

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 cannot meet the requirements of this permit or cannot meet applicable standards.

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

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. 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.

B. 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

Pollutant	Tons Per Year
Particulates	36.8
VOC	51.0

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment - (K001) - Miscellaneous Metal Parts Paint Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-21-09(U)(1)(c). See Section A.2.a.
OAC rule 3745-31-05(C) (Synthetic Minor to avoid NSR and Title V)	The VOC emissions from this emissions unit shall not exceed 51 TPY from coatings, preparation and cleanup materials, based upon a rolling, 12-month summation.
OAC rule 3745-21-09(U)(1)(c)	The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
OAC rule 3745-21-18(C)	See Sections B.2, B.3, B.4, and B.5.

2. Additional Terms and Conditions

2.a The VOC content of the preparation and cleanup materials employed shall not exceed 8 lbs per gallon, as applied, excluding water and exempt solvents.

B. Operational Restrictions

1. The annual coating usage for this emissions unit shall not exceed 28,600 gallons, based upon a rolling, 12-month summation.

   The annual preparation and cleanup material usage for this emissions unit shall not exceed 250 gallons, based upon a rolling, 12-month summation.

   To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the coating usage and the preparation and cleanup usage specified in the following table:

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Month(s)	Maximum Allowable Cumulative Coating Usage, in Gallons	Maximum Allowable Cumulative Preparation and Cleanup Material Usage, in Gallons
1	5,800	55
1-2	11,600	110
1-3	17,400	165
1-4	23,200	220
1-5	28,600	250
1-6	28,600	250
1-7	28,600	250
1-8	28,600	250
1-9	28,600	250
1-10	28,600	250
1-11	28,600	250
1-12	28,600	250

After the first 12 calendar months of operation, compliance with the annual coating usage and the preparation and cleanup material usage limitations shall be based upon a rolling, 12-month summation of the coating usage and the preparation and cleanup material usage.

2. The permittee shall use one or more of the following application techniques, in accordance with manufacturer's specifications, to apply any coating containing a VOC as a pretreatment, primer, sealant, basecoat, clear coat, or topcoat to mobile equipment for commercial purposes:

   a. flow or curtain coating;

   b. dip coating;

   c. roller coating;

   d. brush coating;

   e. cotton-tipped swab application;

   f. electro-deposition coating;

   g. high volume, low pressure (HVLP) spraying;

   h. electrostatic spray;

   i. airless spray;

   j. air-assisted airless spray; and

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k. Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the Director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone.

3. A person at the facility shall be properly trained in the use of an HVLP sprayer, or equivalent application, in accordance with manufacturer's specifications, and the handling of a coating and any solvents used to clean the sprayer.

4. Spray guns used to apply mobile equipment repair and refinishing coatings shall be cleaned by one of the following:

   a. an enclosed spray gun cleaning system that is kept closed when not in use;

   b. un-atomized discharge of solvent into a paint waste container that is kept closed when not in use;

   c. disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; and

   d. atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

5. The permittee shall store the following materials in nonabsorbent, non-leaking containers and keep these containers closed at all times when not in use:

   a. fresh coatings;

   b. used coatings;

   c. solvents;

   d. VOC-containing additives and materials;

   e. VOC-containing waste materials; and

   f. cloth, paper, or absorbent applicators moistened with any of the items listed in this subsection.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. the coating usage;

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b. the preparation and cleanup material usage; and

c. beginning after the first 12 calendar months of operation, the rolling, 12-month summations of the coating usage and the preparation and cleanup material usage.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative coating usage and the preparation and cleanup material usage for each calendar month.

2. The permittee shall collect and record the following information each month for the line:

a. the name and identification number of each coating, as applied;

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

c. the number of gallons (excluding water and exempt solvents) of each coating employed;

d. the name and identification of each preparation and cleanup material employed;

e. the VOC content of each preparation and cleanup material, in pounds per gallon;

f. the number of gallons of each preparation and cleanup material employed; and

g. the total VOC emissions from all coatings, preparation and cleanup materials employed, in tons as a rolling 12-month summation.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit-to-install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

3. The permit to install for this emissions unit K001 was evaluated based on the actual materials (coating, preparation and cleanup materials) employed, and the design parameters of the emissions units exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarized the results of the modeling for the "worst-case" pollutant(s).

Pollutant: Butyl Acetate

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TLV(ppm): 150

Maximum Hourly Emission Rate (lbs/hr): 25.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 539.1

MAGLC(ug/m3): 16,967

Physical changes to or changes in the method of operation of the emissions unit after its installation could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the Permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of the new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

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b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations on coating usage and preparation and cleanup material usage; and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative coating usage and preparation and cleanup material usage. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emissions limitation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

4. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. Not later than 120 days after startup, the permittee shall submit documentation sufficient to demonstrate that high efficiency transfer application techniques of coatings required in Section B.2 are in use at the facility. The documentation also shall verify that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, and in the handling of a coating and any solvents used to clean the sprayer. This documentation shall be submitted to the appropriate Ohio EPA district office or local air agency. In addition, the owner or operator shall retain the documentation on site and make the documentation available to the Ohio EPA or local air agency upon request.

E. Testing Requirements

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

   a. Emission Limitation -

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The VOC content of the coatings employed shall not exceed 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method -
Compliance shall be based on the record keeping specified in Section C.2.

b. Emission Limitation -
The VOC content of the preparation and cleanup materials employed shall not exceed 8 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method -
Compliance shall be based on the record keeping specified in Section C.2.

c. Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 51 TPY from coatings, preparation and cleanup materials, based upon a rolling, 12-month summation.

Applicable Compliance Method -
Compliance shall be based on the record keeping specified in Section C.2.

F. Miscellaneous Requirements

1. The terms and conditions of sections A.1, B.1, C.1, C.2, D.1, D.2, and E.1.c of this PTI are federally enforceable.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment - (P001) - Abrasive Blasting Booth with Baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The particulate emissions (PE) from this emissions unit shall not exceed 8.4 lbs/hr and 36.8 tons per year (TPY). Visible PE from any stack shall not exceed 5 percent opacity as a six-minute average.
OAC rule 3745-17-07(A)(1)	The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

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

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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 minimize or eliminate the abnormal visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (iv) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the abnormal 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.

E. Testing Requirements

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

   a. Emission Limitation -
   The PE from this emissions unit shall not exceed 8.4 lbs/hr.

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Applicable Compliance Method -
Compliance shall be determined by multiplying the PE grain loading from the baghouse (0.020 gr/dscf) by the stack air flow rate (49,000 cfm), by 60 minutes per hour and dividing by 7,000 grains per pound.

b. Emission Limitation -
The PE from this emissions unit shall not exceed 36.8 TPY.

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly PE rate (8.4 lbs/hr) by the maximum annual operating hours (8,760 hrs/yr) and dividing by 2,000 lbs/ton.

c. Emission Limitation -
The visible PE from any stack shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method -
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

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