



State of Ohio Environmental Protection Agency

Street Address:

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

02/29/00

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

02-50-00-0005
Whitacre-Greer
Lynn A. Morrison
1400 South Mahoning Avenue
Alliance, OH 44601

Dear Lynn A. Morrison:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Northeast District Office.

Very truly yours,

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

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Northeast District Office
Pennsylvania
West Virginia



Ohio EPA

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 02/29/00

Effective Date:

Expiration Date:

The duration of this permit will be five years.

This document constitutes issuance to:

Whitacre-Greer
1400 South Mahoning Avenue
Alliance, OH 44601

of a Title V permit for Facility ID: 02-50-00-0005

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:

F001 (Jaw Crusher)
brick crushing unit with water spray particulate control

F002 (Crushing/Screening)
crushing, grinding, and screening of raw materials (clay prep)

P004 (Tunnel Kiln #1)
tunnel kiln #1 used for firing brick

P005 (Tunnel Kiln #2)
tunnel kiln #2 used for firing brick (Miller Kiln)

P007 (Mechanical Tumbler)
surface finishing of bricks

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

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 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 of federally enforceable 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.6 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 applicable, the permittee shall 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”); and, pursuant to 40 CFR 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management 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.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. 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.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 and to the Administrator of U.S. EPA in the following manner in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) 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.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. 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.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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 of state-only enforceable 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 state-only required 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. 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).

4. 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.

5. 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.

6. 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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

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

Z001 - Dryer #1, dried brick
Z002 - Dryer #2, dried brick
Z003 - Dryer #3, dried brick
Z004 - Wet Mixing

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Jaw Crusher (F001)

Activity Description: brick crushing unit with water spray particulate control

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| Jaw Crusher | OAC rule 3745-17-07(B) | See A.I.2.a. |
| | OAC rule 3745-17-08(B) | See A.I.2.b. |

2. Additional Terms and Conditions

- 2.a In accordance with paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07 (B) shall not apply to this emissions unit.
- 2.b In accordance with paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08 (B) shall not apply to this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| Jaw Crusher | OAC rule 3745-31-05 PTI No. 02-9733 | See A.I.2.a. |

2. Additional Terms and Conditions

- 2.a Particulate emissions shall not exceed 6.0 pounds per hour.

II. Operational Restrictions

1. The permittee shall operate a water spray system to control particulate emissions whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the amount of material processed, and
 - b. the periods of time when the water spray system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water spray system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

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):

- 1.a Emission Limitation:
Particulate emissions shall not exceed 6.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be based on a calculation using the emission factor from AP-42, Section 11.19.2, Table 11.19.2-2, January 1995.

$E(\text{PM emissions}) = 0.0007 \text{ lb PM/ton crushed (emission factor)} \times 5 \text{ tons brick crushed /hour (maximum equipment capacity)}$.

Facility Name: **Whitacre-Greer Fireproofing Company**
Facility ID: **02-50-00-0005**
Emissions Unit: **Jaw Crusher (F001)**

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Crushing/Screening (F002)

Activity Description: crushing, grinding, and screening of raw materials (clay prep)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---------------------------------------|--|
| Crushing, grinding and screening operations | OAC rule 3745-17-07 (B) | See A.I.2.a. |
| | OAC rule 3745-17-08 (B) | See A.I.2.b. |

2. Additional Terms and Conditions

- 2.a In accordance with paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07 (B) shall not apply to this emissions unit.
- 2.b In accordance with paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08 (B) shall not apply to this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
|---|---|--|

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Tunnel Kiln #1 (P004)
Activity Description: tunnel kiln #1 used for firing brick

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|---------------------------------------|--|
| Tunnel Kiln #1 Swindell - Dressler tunnel kiln fired by natural gas | OAC rule 3745-17-07(A) | See A.I.2.a. |
| | 40 CFR 52.1881(b)(22)(vi) | See A.I.2.b. |
| | OAC rule 3745-17-11 | See A.I.2.c. |

2. Additional Terms and Conditions

- Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by the rule.
- Sulfur dioxide emissions from the kiln shall not exceed 20 pounds per ton of actual process weight input .
- Particulate emissions from this emissions unit shall be less than 10 lbs/hr*.

*The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour (the permittee has demonstrated this based on stack testing). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the allowable PE limitation is greater than 10 lbs PE/hr. However, to ensure that Figure II will not be applicable, the permittee has agreed to accept the PE limitation stated above (less than 10 lbs/hr).

II. Operational Restrictions

- The sulfur content of the raw materials used in this emissions unit shall not exceed 0.3% sulfur, by weight, as a monthly weighted average.
- The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall collect or require the supplier(s) to collect a representative grab sample of each shipment of clay or shale that is received for processing in this emissions unit. The permittee shall perform or require the supplier(s) to perform the material sampling and analyze each sample for sulfur content (percent) using the infra-red absorption technique. Alternative, but equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each shipment of clay or shale received for processing in this emissions unit, the permittee shall maintain records of total quantity of material received and the permittee's or supplier's analyses for sulfur content.
3. The permittee shall calculate and record the monthly weighted average sulfur content of the raw materials received for this emissions unit (% sulfur).
4. The permittee shall calculate and record the sulfur dioxide emission rate for each shipment of clay or shale, based on the sulfur analysis of the raw material, in pounds of sulfur dioxide per ton of raw material. This shall be determined by using the following equation:

Pounds of SO₂/ton of raw material = (sulfur content [weight %/100%]) X (2 pounds SO₂/ pound sulfur) X (2000 pounds SO₂/ton of SO₂)

5. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit, on a quarterly basis, copies of the permittee's or supplier's analyses for each shipment of material which is received for processing in this emissions unit. The permittee or supplier's analyses shall document the sulfur content (percent) of each shipment of raw material. The following information shall also be included with the copies of the permittee's or supplier's analyses:
 - a. the total quantity of clay and shale received in each shipment (tons); and
 - b. the weighted* average sulfur content of the clay and shale received during each calendar month.

*In proportion to the quantity of clay and shale received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the clay and shale shipments received during the previous calendar quarters.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the sulfur dioxide emission limitation of 20.0 pounds of sulfur dioxide per ton of raw material, based upon the record keeping in section A.III.

V. Testing Requirements

1. Emission Limitation
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method
OAC rule 3745-17-03(B)(1), if requested.
2. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s): for particulates, Method 5 of 40 CFR Part 60, Appendix A . Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
3. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s): for SO₂, Method 6E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 4.a The emission testing shall be conducted to demonstrate compliance with the allowable particulate and sulfur dioxide emission rates.

V. Testing Requirements (continued)

- 4.b** The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.
- 4.c** The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- 4.d** The sulfur content (% by weight) of the raw material(s) used during the compliance test shall be determined.
- 5.** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| Tunnel Kiln #1 Swindell - Dressler tunnel kiln fired by natural gas | OAC rule 3745-18-56(B) | See B.I.2.a. |

2. Additional Terms and Conditions

- 2.a Sulfur dioxide emissions shall not exceed 12 pounds of sulfur dioxide per ton of product from the kiln.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the sulfur dioxide emissions limitation of 12.0 pounds of sulfur dioxide per ton of raw material, based upon the record keeping in section A.III.

V. Testing Requirements

1. Compliance with sulfur dioxide limit shall be based on the monitoring and record keeping of Section A.III. and the testing of Section A.V.4.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Tunnel Kiln #2 (P005)
Activity Description: tunnel kiln #2 used for firing brick (Miller Kiln)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|---------------------------------------|--|
| Tunnel Kiln #2 Swindell - Dressler tunnel kiln fired by natural gas | OAC rule 3745-17-07(A) | See A.I.2.a. |
| | 40 CFR 52.1881(b)(22)(vi) | See A.I.2.b. |
| | OAC rule 3745-17-11 | See A.I.2.c. |

2. Additional Terms and Conditions

- Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by the rule.
- Sulfur dioxide emissions from the kiln shall not exceed 20 pounds per ton of actual process weight input .
- Particulate emissions from this emissions unit shall be less than 10 lbs/hr*.

*The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour (the permittee has demonstrated this based on stack testing). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the allowable PE limitation is greater than 10 lbs PE/hr. However, to ensure that Figure II will not be applicable, the permittee has agreed to accept the PE limitation stated above (less than 10 lbs/hr).

II. Operational Restrictions

- The sulfur content of the raw materials used in this emissions unit shall not exceed 0.3% sulfur, by weight, as a monthly weighted average.
- The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall collect or require the supplier(s) to collect a representative grab sample of each shipment of clay or shale that is received for processing in this emissions unit. The permittee shall perform or require the supplier(s) to perform the material sampling and analyze each sample for sulfur content (percent) using the infra-red absorption technique. Alternative, but equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each shipment of clay or shale received for processing in this emissions unit, the permittee shall maintain records of total quantity of material received and the permittee's or supplier's analyses for sulfur content.
3. The permittee shall calculate and record the monthly weighted average sulfur content of the raw materials received for this emissions unit(% sulfur).
4. The permittee shall calculate and record the sulfur dioxide emission rate for each shipment of clay or shale, based on the sulfur analysis of the raw material, in pounds of sulfur dioxide per ton of raw material. This shall be determined by using the following equation:

Pounds of SO₂/ton of raw material = (sulfur content [weight %/100%]) X (2 pounds SO₂/ pound sulfur) X (2000 poundsSO₂/ton of SO₂)

5. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit, on a quarterly basis, copies of the permittee's or supplier's analyses for each shipment of material which is received for processing in this emissions unit. The permittee or supplier's analyses shall document the sulfur content (percent) of each shipment of raw material. The following information shall also be included with the copies of the permittee's or supplier's analyses:
 - a. the total quantity of clay and shale received in each shipment (tons); and
 - b. the weighted* average sulfur content of the clay and shale received during each calendar month.

*In proportion to the quantity of clay and shale received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the clay and shale shipments received during the previous calendar quarters.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the sulfur dioxide emission limitation of 20.0 pounds of sulfur dioxide per ton of raw material, based upon the record keeping in section A.III.

V. Testing Requirements

1. Emission Limitation
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method
OAC rule 3745-17-03(B)(1), if requested.

2. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s): for particulates, Method 5 of 40 CFR Part 60, Appendix A . Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
3. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s): for SO₂, Method 6E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 4.a The emission testing shall be conducted to demonstrate compliance with the allowable particulate and sulfur dioxide emission rate.

V. Testing Requirements (continued)

- 4.b** The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.
- 4.c** The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- 4.d** The sulfur content (% by weight) of the raw material(s) used during the compliance test shall be determined.
- 5.** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| Tunnel Kiln #2 Swindell - Dressler tunnel kiln fired by natural gas | OAC rule 3745-18-56(B) | See B.I.2.a. |

2. Additional Terms and Conditions

- 2.a Sulfur dioxide emissions shall not exceed 12 pounds of sulfur dioxide per ton of product from the kiln.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the sulfur dioxide emission limitation of 12.0 pounds of sulfur dioxide per ton of raw material, based upon the record keeping in section A.III.

V. Testing Requirements

1. Compliance with sulfur dioxide limit shall be based on the monitoring and record keeping of Section A.III. and the testing of Section A.V.4.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mechanical Tumbler (P007)

Activity Description: surface finishing of bricks

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---------------------------------------|--|
| Mechanical brick tumbler | OAC rule 3745-17-07(A) | See A.I.2.a. |
| | OAC rule 3745-17-11 | See A.I.2.b. |

2. Additional Terms and Conditions

- 2.a Visible particulate emissions shall not exceed twenty per cent opacity as a six-minute average, except as provided by the rule.
- 2.b Particulate emissions from this emissions unit shall be less than 10 lbs/hr*.

*The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour (the permittee has demonstrated this based on stack testing). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the allowable PE limitation is greater than 10 lbs PE/hr. However, to ensure that Figure II will not be applicable, the permittee has agreed to accept the PE limitation stated above (less than 10 lbs/hr).

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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

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.

Facility Name: **Whitacre-Greer Fireproofing Company**

Facility ID: **02-50-00-0005**

Emissions Unit: **Mechanical Tumbler (P007)**

V. Testing Requirements

1. Emission Limitation
20% opacity as a six-minute average, except as provided by the rule

Applicable Compliance Method

Compliance with the allowable visible emissions limitations of this permit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

2. Emission Limitation
10 pounds per hour particulate emissions

Applicable Compliance Method

If required by the Ohio EPA, compliance with the PM limit shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10). No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A). Such testing may be required at opacity levels less than those required by the visible emissions limit in section A.I.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/ Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--|
| Mechanical brick tumbler | OAC rule 3745-31-05 PTI No. 02-12495 | See A.I.2.a. and b. |

2. Additional Terms and Conditions

- 2.a** Particulate emissions (PE) from the fabric filter baghouse exhaust shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf) of exhaust gases, 0.47 pound per hour and 2.06 tons per year.
- 2.b** Visible particulate emissions shall not exceed five percent opacity, as a six-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Emission Limitation
PE: 2.06 tons/yr

Applicable Compliance Method

This limit is based on the allowable hourly emission limit (0.47 lb/hr) multiplied by the maximum possible operating hours (8760 hr/yr), and divided by 2000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

2. Emission Limitation
5% opacity, as a six-minute average

Applicable Compliance Method

If required by the Ohio EPA, compliance with the allowable visible emissions limitations of this permit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

3. Emission Limitation
0.03 gr/dscf and 0.47 per hour particulate emissions

Applicable Compliance Method

If required by the Ohio EPA, compliance with these PE limits shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

Facility Name: **Whitacre-Greer Fireproofing Company**

Facility ID: **02-50-00-0005**

Emissions Unit: **Mechanical Tumbler (P007)**

VI. Miscellaneous Requirements

None

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