



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

06/20/01

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

02-85-02-0059

Morton Salt Division of Morton International, Inc.
David H. Vuylsteke
151 S. Industrial St.
Rittman, OH 44270

Dear David H. Vuylsteke:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on (not issued). The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

and

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

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

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

cc: Northeast District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 06/20/01	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 02-85-02-0059 to:
Morton Salt Division of Morton International, Inc.
 151 S. Industrial St.
 Rittman, OH 44270

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

B001 (Nat Gas-fired Boiler) Murray model MCF-32 nat. gas-fired boiler; 27,500 lbs/hr rated steam output. Provides process heat to evaporators for salt production.	P007 (Block Press System) Block Press System - block press, brick press, spool press	P028 (High Purity Salt Packaging System) Automated packaging system for high purity and granulated salt products
B002 (Coal-fired Boiler No.2) Riley 140 MMBTU/hr traveling grate coal-fired Riley boiler. Provides process heat to evaporators for salt production.	P008 (Prod. Convey. Equip.) South end of 3rd Floor Mill - bucket elevators, conveyors, and screens	P029 (Entoleter Pulverizer) Salt Pulverized, conveyors
B003 (Coal-fired Boiler No.1) Riley 140 MMBTU/hr traveling grate coal-fired boiler. Provides process heat to evaporators for salt production.	P009 (3rd Flr Mill Screening) 3rd Flr Mill screening; 2nd Flr packaging; bucket elevators, conveyors, and screens	P030 (999 Salt Fluid Bed Dryer) High purity salt drying process.
B004 (Backup Boiler) Union Iron Works natural gas-fired boiler; 70,000 lbs/hr rated steam output. Serves as backup to two coal-fired boilers	P010 (4th Flr Blended Salt) 4th Floor Bended Salt System: Bulk storage of blended salt	P031 (North Filter Wheel) Used for drying granulated salt
P002 (Flake System) First Floor Mill Flake System - flakers, elevators, conveyors, screens, and baggers	P011 (4th Flr Auxilliary) Seasoned Salt Line; TM bagging; Meat Cure product packaging	P032 (Middle Filter Wheel) Used for drying granulated salt
P003 (Bulk Loading) South Storage West Bulk Loading - elevators, belts, screens	P013 (4th Flr Pellet System) Pelletized salt products: Elevators, screens, conveyors, crushers, bins.	P033 (South Filter Wheel) Used for drying high purity salt
P004 (H2S Stripping Tower) H2S Tower removes naturally occurring dissolved H2S from process brine.	P014 (2nd Flr Pellet System) Pelletized salt products: pellet presses and conveyors	P034 (Granulated Cascade Cooler) Used for cooling granulated salt off the filter wheels
	P016 (Rotary Conditioner) Rotary conditioner used for cooling bulk salt	P035 (999 Cascade Cooler) Used for cooling high purity salt off the South Filter Wheel.
	P019 (999 Storage System) High Purity Salt Storage and Handling System: Bins, elevators, conveyors, and screens	P036 (Entoleter - 1st Floor Station) Pulverized salt bagging station
		P037 (One and Two Vapor Take-off) Vapor take-off fans for granulated and high purity salt off the filter wheels

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 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.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i)

and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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 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. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

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 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. 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

1. Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

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

F001 - Outside Sandblasting
P005 - South Storage Barrell Fill
P015 - North/South Soda Ash Silos
P017 - Waste Paper System
P018 - #1 and #2 Tubewinders
P020 - South Storage Bulk
P021 - East Dock Pallet Blow-Off Station
R001 - Plant Equipment Painting
T001 - Muriatic Acid Tank
Z005 - South Cooling Tower
Z006 - North Cooling Tower
Z007 - Wellfield Roads
Z008 - Parking Lots
Z009 - Paved Areas
Z010 - NPDES Cooling Tower

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: Nat Gas-fired Boiler (B001)

Activity Description: Murray model MCF-32 nat. gas-fired boiler; 27,500 lbs/hr rated steam output. Provides process heat to evaporators for salt production.

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>
34.9 MMBtu/hour Standby Gas Fired Boiler	OAC rule 3745-17-10(B)(1) OAC rule 3745-17-07(A)(1) 40 CFR Part 60, Subpart Dc OAC rule 3745-31-05(A)(3) (PTI # 02-8949)	0.020 lb Particulate Emissions (PE) per MMBtu/hour 20% opacity as a six-minute average, except as provided by rule See A.III.1. 0.46 lb PE per hour and 2.0 TPY; 4.7 lbs Nitrogen Oxides (NOx) per hour and 20.5 TPY; and 1.17 lbs Carbon Monoxide (CO) per hour and 5.1 TPY. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 and 3745-17-10 and 40 CFR Part 60, Subpart Dc.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall combust only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to 40 CFR, Subpart Dc, the permittee shall record and maintain records of the amount of natural gas combusted during each day.

IV. Reporting Requirements

- 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.

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports that specify the total emissions of particulates, NO_x and CO from this emissions unit. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

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

Emission Limitation

0.020 lb particulate emissions (PE) per MMBtu/hour of heat input

Applicable Compliance Method

Multiply the particulate emissions factor of 1.9* pounds of particulate emissions per million cubic feet of natural gas combusted by the inverse of the heat content of the natural gas, in Btu per cubic foot, as supplied by the gas supplier. (*Emission factor is from AP - 42, Table 1.4 -2.)

2. 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.

3. Emission Limitation
1.17 lbs carbon monoxide (CO) per hour and 5.1 TPY

Applicable Compliance Method

To determine the hourly CO emissions, multiply the emission factor of 35* pounds of CO per million cubic feet of the natural gas combusted by the maximum hourly heat input (34.9 MM Btu/hour) and by 1 cubic foot of natural gas/ 1040 Btu. (*Emission factor is from AP - 42, Table 1.4 -2.) To determine the annual emissions, annually sum the natural gas records which are kept per A.III.1. Then, multiply the emission factor of 35 pounds CO per the million cubic feet of natural gas combusted by the millions of cubic feet of gas combusted and divide by 2000.

4. Emission Limitation
4.7 lbs NO_x per hour and 20.5 TPY

Applicable Compliance Method

To determine the hourly NO_x emissions, multiply the emission factor of 140* pounds NO_x emissions per million cubic feet of the natural gas combusted by the maximum hourly heat input (34.9 MM Btu/hour) and by 1 cubic foot of natural gas/ 1040 Btu. (*Emission factor is from AP - 42, Table 1.4 -2.) To determine the annual emissions, annually sum the natural gas records kept per A.III.1. Then, multiply the emission factor of 140 pounds NO_x per the million cubic feet of the natural gas combusted by the millions of cubic feet of natural gas combusted and divide by 2000.

5. Emission Limitation
0.46 lb PE per hour and 2.0 TPY

Applicable Compliance Method

To determine the hourly PE emissions, multiply the emission factor of 1.9* pounds of particulate emissions per million cubic feet of the natural gas combusted by the maximum hourly heat input (34.9 MM Btu/hour) and by 1 cubic foot of natural gas/ 1040 Btu. (*Emission factor from AP - 42, Table 1.4 -2.) To determine the annual emissions, annually sum the natural gas records kept per A.III.1. Then, multiply the particulate emission factor of 1.9 pounds of PE per million cubic feet of natural gas combusted by the millions of cubic feet of natural gas combusted and divide by 2000.

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>
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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: Coal-fired Boiler No.2 (B002)

Activity Description: Riley 140 MMBTU/hr traveling grate coal-fired Riley boiler. Provides process heat to evaporators for salt production.

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>
140 MM Btu/hour traveling grate, coal-fired Riley boiler with multiclone	OAC rule 3745-17-07(A)(1)	20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-10(C)(2)	0.22 lb particulate emissions (PE) per MM Btu actual heat input
	OAC rule 3745-18-91 (F)	7.0 lbs sulfur dioxide (SO ₂) per MM Btu actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

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

2. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the Ohio EPA Northeast District Office) upon request.
3. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
4. The permittee shall maintain monthly records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, and heat content.

The permittee shall collect representative grab samples of the coal burned in this emissions unit on a daily basis. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA Northeast District Office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

IV. Reporting Requirements (continued)

2. Quarterly reports shall be submitted concerning the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal burned (tons);
 - b. the average ash content (percent) of the coal burned;
 - c. the average sulfur content (percent) of the coal burned;
 - d. the average heat content (Btu/pound) of the coal burned; and
 - e. the average SO₂ emissions rate (pounds SO₂/MM Btu actual heat input) from the coal burned.

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

V. Testing Requirements

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

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. Emission Limitation
0.22 lb of particulate emissions (PE) per MM Btu actual heat input

Applicable Compliance Method

OAC rule 3745-17-03 (B)(10)

The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 0.22 lb/mmBtu actual heat input in accordance with the following requirements:

The particulate emission testing shall be conducted three times during the term of this permit. Once within 6 months of the effective date of this permit, once between years 2 and 3, and once during the last year of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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.

V. Testing Requirements (continued)

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.

3. Emission Limitation

7.0 lbs sulfur dioxide (SO₂) per MM Btu actual heat input

Applicable Compliance Method

Compliance shall be determined by using the fuel analysis records required pursuant to Section A.III.1. and the applicable equation in OAC rule 3745-18-04(F).

Emission Limitation

7.0 lbs Sulfur Dioxide (SO₂) per MM Btu actual heat input

Applicable Compliance Method

Compliance shall be determined by using the fuel analysis records required pursuant to Section A.III.1. and the applicable equation in OAC rule 3745-18-04(F). An alternative means of calculating sulfur dioxide emissions may be employed if such means is demonstrated to be more accurate in this specific instance than the above method to the satisfaction of the Director (the Ohio EPA Northeast District Office) provides written approval of same.

If required, the permittee shall conduct, or have conducted, sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 7.0 lbs/MM btu actual heat input in accordance with the following requirements:

Compliance with the allowable mass emission rate for sulfur dioxide shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 6 and the procedures in OAC rule 3745-18-04(D).

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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>
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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: Coal-fired Boiler No.1 (B003)

Activity Description: Riley 140 MMBTU/hr traveling grate coal-fired boiler. Provides process heat to evaporators for salt production.

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>
140 MM Btu/hour traveling grate, coal-fired Riley boiler with multiclone	OAC rule 3745-17-07(A)(1)	20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-10(C)(2)	0.22 lb particulate emissions (PE) per MM Btu actual heat input
	OAC rule 3745-18-91(F)	7.0 lbs sulfur dioxide (SO ₂) per MM Btu actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emissions limitation specified in Section A.I. above.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

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

2. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the Ohio EPA Northeast District Office) upon request.
3. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
4. The permittee shall maintain monthly records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, and heat content.

The permittee shall collect representative grab samples of the coal burned in this emissions unit on a daily basis. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA Northeast District Office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

IV. Reporting Requirements (continued)

2. Quarterly reports shall be submitted concerning the quality and quantity of the coal burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal burned (tons);
 - b. the average ash content (percent) of the coal burned;
 - c. the average sulfur content (percent) of the coal burned;
 - d. the average heat content (Btu/pound) of the coal burned; and
 - e. the average SO₂ emissions rate (pounds SO₂/MM Btu actual heat input) from the coal burned.

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

V. Testing Requirements

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

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. Emission Limitation
0.22 lb of particulate emissions (PE) per MM Btu actual heat input

Applicable Compliance Method

OAC rule 3745-17-03 (B)(10)

The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 0.22 lb/MM Btu actual heat input in accordance with the following requirements:

The particulate emission testing shall be conducted three times during the term of this permit. Once within 6 months of the effective date of this permit, once between years 2 and 3, and once during the last year of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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.

V. Testing Requirements (continued)

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.

3. Emission Limitation
7.0 lbs Sulfur Dioxide (SO₂) per MM Btu actual heat input

Applicable Compliance Method

Compliance shall be determined by using the fuel analysis records required pursuant to Section A.III.1. and the applicable equation in OAC rule 3745-18-04(F). An alternative means of calculating sulfur dioxide emissions may be employed if such means is demonstrated to be more accurate in this specific instance than the above method to the satisfaction of the Director (the Ohio EPA Northeast District Office) and the Director (the Ohio EPA Northeast District Office) provides written approval of same.

If required, the permittee shall conduct, or have conducted, sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 7.0 lbs/MM btu actual heat input in accordance with the following requirements:

Compliance with the allowable mass emission rate for sulfur dioxide shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 6 and the procedures in OAC rule 3745-18-04(D).

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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>
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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: Backup Boiler (B004)

Activity Description: Union Iron Works natural gas-fired boiler; 70,000 lbs/hr rated steam output. Serves as backup to two coal-fired boilers

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>
83.4 MM Btu/hour Natural Gas Fired Back Up Boiler	OAC rule 3745-17-10(B)(1)	0.020 lb Particulate Emissions (PE) per MMBtu/Hour of heat input
	OAC rule 3745-17-07(A)(1)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05
	40 CFR Part 60, Subpart Dc	See A.II.2.
	OAC rule 3745-31-05(A)(3) (PTI # 02-9850)	1.17 lb PE/hour and 2.34 tons PE per year; 10.83 lbs NOx per hour and 21.66 tons NOx per year; 2.71 lbs carbon monoxide (CO) per hour and 5.42 tons CO per year. 0.05 lbs SO2 per hour and 0.10 tons SO2 per year
		See A.I.2.a. See A.II.1.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10 and 40 CFR Part 60, Subpart Dc.

2. Additional Terms and Conditions

- Visible emissions from this emissions unit shall not exceed ten percent opacity as a six-minute average, except for a one hour period during startup of this unit. Visible emissions during this one hour startup period shall not exceed twenty percent opacity as a six-minute average.

II. Operational Restrictions

- The maximum annual operating hours for this emissions unit shall not exceed 4,000, based upon a rolling, 12-month summation of the operating hours.
- The permittee shall use only natural gas as fuel for this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-9850, issued on April 3, 1996: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. Pursuant to 40 CFR 60, Subpart Dc, the permittee shall record and maintain records of the amount of natural gas combusted during each day.
3. The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month.
 - b. The rolling, 12-month summation of the operating hours.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-9850, issued on April 3, 1996: A.IV.2, A.IV.3., and A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
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 which identify all exceedances of the rolling, 12-month operating hours limitation.
4. The permittee shall submit annual reports that specify the total hours of operation for this emissions unit and emissions of particulates, NOx and CO from this emissions unit. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-9850, issued on April 3, 1996: A.V.2., A.V.3., A.V.4., A.V.5., A.V.6., A.V.7., A.V.8., and A.V.9. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. and the operating restrictions in Section II of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation

0.020 lb particulate emissions (PE) per MM Btu/hour of heat input

Applicable Compliance Method

Multiply the particulate emissions factor of 1.9* pounds of particulate emissions per million cubic feet of natural gas combusted by the inverse of the heat content of the natural gas, in Btu per cubic foot, as supplied by the gas supplier. (*Emission factor is from AP - 42, Table 1.4 -2.)

V. Testing Requirements (continued)

3. Emission Limitation
Visible emissions from this emissions unit shall not exceed ten percent opacity as a six-minute average, except for a one hour period during startup of this unit. Visible emissions during this one hour startup period shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method
OAC rule 3745-17-03(B)(1), if requested.
4. Operating Restriction
4,000 hours per rolling 12-month period.

Applicable Compliance Method
Each month compliance shall be determined by summing the records kept via section A.III.3. of this permit for the past 12-month period.
5. Operating Restriction
The permittee shall use only natural gas as fuel for this emissions unit.

Applicable Compliance Method
Compliance shall be determined by reviewing the records from Section A.III.2.
6. Emission Limitation
2.71 lbs carbon monoxide (CO) per hour and 5.42 TPY

Applicable Compliance Method
To determine the hourly CO emissions, multiply the emission factor of 35* pounds of CO per million cubic feet of the natural gas combusted by the maximum hourly heat input (83.4 MM Btu/hour) and by 1 cubic foot of natural gas/ 1040 Btu. (*Emission factor is from AP - 42, Table 1.4 -2.) To determine annual emissions, annually sum the records kept per A.III.2. Then, multiply the emission factor or 35 pounds CO per million cubic feet of natural gas combusted by the millions of cubic feet of natural gas combusted and divide by 2000.
7. Emission Limitation
0.05 lbs sulfur dioxide (SO₂) per hour and 0.10 TPY

Applicable Compliance Method
To determine the hourly SO₂ emissions, multiply the emission factor of 0.60* pound of SO₂ per million cubic feet of the natural gas combusted by the maximum hourly heat input (83.4 MM Btu/hour) and by 1 cubic foot of natural gas/ 1040 Btu. (*Emission factor is from AP - 42, Table 1.4 -2.) To determine annual emissions, annually sum the records kept per A.III.2. Then, multiply the emission factor of 0.60 pound SO₂ per million cubic feet of natural gas combusted by the millions of cubic feet of gas combusted and divide by 2000.
8. Emission Limitation
10.83 lbs NO_x per hour and 21.66 TPY

Applicable Compliance Method
To determine the hourly NO_x emissions, multiply the emission factor of 140* pounds of NO_x per million cubic feet of the natural gas combusted by the maximum hourly heat input (83.4 MM Btu/hour) and by 1 cubic foot of natural gas/ 1040 Btu. (*Emission factor is from AP - 42, Table 1.4 -2.) To determine the annual emissions, annually sum the records kept per A.III.2. Then, multiply the emission factor of 35 pounds CO per million cubic feet of natural gas combusted by the millions of cubic feet of gas combusted and divide by 2000.

V. Testing Requirements (continued)

9. Emission Limitation
1.17 lbs PE per hour and 2.34 TPY

Applicable Compliance Method

To determine the hourly particulate emissions, multiply the emission factor of 1.9* pounds of emissions per million cubic feet of natural gas combusted by the maximum hourly heat input (83.4 MM Btu/hour) and by 1 cubic foot of natural gas/ 1040 Btu. (*Emission factor is from AP - 42, Table 1.4 -2.) To determine the annual emissions, annually sum the records kept per A.III.2. Then, multiply the emission factor of 1.9 pounds particulates per million cubic feet of natural gas combusted by the millions of cubic feet of gas combusted and divide by 2000.

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>
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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: Flake System (P002)

Activity Description: First Floor Mill Flake System - flakers, elevators, conveyors, screens, and baggers

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>
First Floor Mill Flake System - Flakers, Elevators, Conveyors, Screens, and Baggers with 57,000 acfm tray-type wet scrubber	OAC rule 3745-17-11	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR Part 60 Subpart 000.
	OAC rule 3745-17-07	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR Part 60 Subpart 000.
	OAC rule 3745-17-08 (B)	This rule does not apply per OAC rule 3745-17-08(A)(1).
	40 CFR Part 60 Subpart 000	Each dry screen, bucket and belt elevator, storage bin and bagger associated with this emissions unit shall be vented to the tray-type scrubber associated with this emissions unit, which shall emit no more than 0.05 gram of particulate emissions (PE) per dry standard cubic meter of exhaust gas from the tray-type wet scrubber.
		There shall be no visible fugitive dust emissions from any building enclosing any transfer point on any conveyor belt or affected operation.
		There shall be no visible fugitive dust emissions which exceed 7% opacity from any vent of any building enclosing any transfer point on a conveyor belt or elevator.
	OAC rule 3745-31-05 (PTI # 02-1084)	1.17 lbs PE per hour from the tray-type wet scrubber

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure differential across the wet scrubber shall be maintained within + or - 30 percent of the average determined during the most recent performance test that demonstrated compliance with the allowable mass emission limitations and visible emission limitations.
2. The scrubbing liquid flow rate to the wet scrubber shall be maintained within + or - 30 percent of the average determined during the most recent performance test that demonstrated compliance with the allowable mass emission limitations and visible emission limitations.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-1084, issued on June 11, 1997: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall calibrate, maintain and operate the following monitoring devices:
 - 2.a A device for the continuous measurement of the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate within + or - 250 pascals + or - 1 inch water gauge pressure and must be calibrated on an annual basis in accordance with the manufacturer's instructions.
 - 2.b A device for the continuous measurement of the scrubbing liquid flow rate to the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within + or - 5 percent of design scrubbing liquid flow rate and must be calibrated on an annual basis in accordance with the manufacturer's instructions.
3. The permittee shall collect and record the following information each day:
 - a. The differential air pressure across the scrubber, in inches of water.
 - b. The scrubbing liquid flow rate to the wet scrubber, in gpm/1000 cubic feet of exhaust gases.
 - c. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

4. The permittee shall perform daily checks for any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and from the building housing 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 location of the visible emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-1084, issued on June 11, 1997: A.IV.2., A.IV.3., and A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the scrubber did not comply with the allowable range specified above.
3. The permittee shall submit quarterly scrubber flow rate (excursion) reports that identify all periods of time during which the liquid flow rate to the scrubber did not comply with the allowable range specified above.
4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and/or from the building housing this emissions unit were observed and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-1084, issued on June 11, 1997: A.V.2. and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

2.a Emission Limitation

No visible fugitive dust emissions from any building enclosing any transfer point on a conveyor belt or any other affected operation.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 22 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

V. Testing Requirements (continued)

2.b Emission Limitation

There shall be no visible fugitive dust emissions from any vent of any building enclosing any transfer point on a conveyor belt or elevator which exceed 7% opacity.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 9 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

2.c Emission Limitation

0.05 gram particulate emissions (PE) per dry standard cubic meter of exhaust gases

Applicable Compliance Method

OAC rule 3745-17-03(B)(10), if requested.

2.d Emission Limitation

1.17 lbs PE per hour

Applicable Compliance Method

OAC rule 3745-17-03(B)(10), if requested.

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within six months of the effective date of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, to establish the average pressure differential across the wet scrubber, and to establish the average scrubbing liquid flow rate to the wet scrubber.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 or Method 17, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The sample volume shall be at least 1.70 dscm (60 dscf). For Method 5, if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at a temperature high enough, but no higher than 121 degrees C (250 degrees Fahrenheit), to prevent water condensation on the filter.
- d. The tests shall be conducted while all the equipment comprising this emissions unit are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- e. A particulate emissions test also shall be conducted at the inlet of the control device to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 or Method 17 of 40 CFR Part 60, Appendix A shall be employed.

V. Testing Requirements (continued)

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 Northeast 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>
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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: Bulk Loading (P003)

Activity Description: South Storage West Bulk Loading - elevators, belts, screens

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>
Rail and truck bulk loading - elevator, belts, and screens with 5600 acfm rotoclone wet collector	OAC rule 3745-17-11(B)	The requirements established pursuant to this rule are equivalent to or less stringent than the requirements established pursuant to OAC rule 3745-31-05(A).
	OAC rule 3745-17-07(A)(1)	20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-31-05(A)(3) (PTI # 02-1483)	The south storage west bulk loading elevators, belts, and screening operation shall be vented to the wet scrubber, which shall exhaust no more than 0.02 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08 (B) is not applicable to this emissions unit.

II. Operational Restrictions

1. The pressure drop across the scrubber shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.
2. The scrubbing liquid flow rate to the wet scrubber must be maintained at not less than 1.8 gallons per minute per 1000 cubic feet of exhaust gases.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02 - 1483, issued on September 26, 1984: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall properly operate and maintain equipment to monitor and record the scrubbing liquid flow rate and the change in pressure of the gas stream across the scrubber while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the differential air pressure across the scrubber, in inches of water;
- b. the scrubbing liquid flow rate to the wet scrubber, in gpm/1000 cubic feet of exhaust gases; and
- c. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during inspections.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-1483, issued on September 26, 1984: A.IV.2. and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the scrubber did not comply with the allowable range specified above.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the liquid flow rate to the scrubber did not comply with the allowable rate specified above.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02 -1483, issued on September 26, 1984: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 2.a Emission Limitation
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method
OAC rule 3745-17-03(B)(1), if requested.
 - 2.b Emission Limitation
0.02 grain of PE per dscf of exhaust gases

Applicable Compliance Method
OAC rule 3745-17-03(B)(10).

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of issuance of the final permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the applicable emissions limitation of 0.02 grain of PE per dscf. The test shall also establish the proper differential air pressure across the scrubber and the scrubbing liquid flow rate to the wet scrubber .
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: RM 1 - 5. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.
 - d. The test(s) shall be conducted while all the equipment comprising this emissions unit are operating at or near their maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

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 Northeast 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>
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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: H2S Stripping Tower (P004)

Activity Description: H2S Tower removes naturally occurring dissolved H2S from process brine.

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>
Hydrogen sulfide stripping tower	OAC rule 3745-31-05(A)(3) (PIT # 02 - 8940)	3.07 lbs/hour hydrogen sulfide See A.II. See A.1.2.a.

2. Additional Terms and Conditions

- 2.a The concentration of hydrogen sulfide emitted shall not exceed 5.1 mg per liter of brine.

II. Operational Restrictions

1. The maximum brine flow rate to the stripping tower shall be 1,728,000 gallons per day. The maximum annual flow of brine to the stripping tower shall be 605,000,000 gallons per year.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-8940, issued on March 29, 1995: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall determine and record the following information weekly:
 - a. For at least one day during each week, the hydrogen sulfide concentration measured at the inlet of the stripping tower, in mg/l;
 - i. Based upon anticipated levels of H2S in the brine, pipet either a 25 ml or 50 ml volume of the standard iodine solution (standard 0.005 N iodine solution) into a dark sample bottle (25 ml for estimated H2S of 0-9 mg/l, 50 ml for estimated H2S of 0-17mg/l).
 - ii. At the sampling point, measure a 250 ml sample of brine. Put it into the dark sampling bottle and then cap it.
 - iii. Pour the contents of the dark sampling bottle into a 600 ml beaker and then acidify with 4-5 drops of glacial acetic acid.
 - iv. Titrate with the standard PAO solution (standard 0.005 N phenylarsine oxide) until the reddish-orange color of iodine becomes a pale yellow. Then add a scoop of thiodene starch. (At this point, the solution turns blue.) Continue the titration slowly until blue color disappears.
 - v. Calculate the mg/l of H2S, i.e., $(mg/l = [a.i. - a.iv.] \times 0.34)$.

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

- b. At the same time the inlet is sampled for 2.a. above, the hydrogen sulfide concentration of the brine shall be measured at the outlet, in mg/l (determined in the same manner as the inlet concentration, see a.i - a.v).
- c. The number of hours per day the emissions unit operated.
- d. The total brine flow rate each day, in gpd.
- e. The calculated concentration of hydrogen sulfide removed, in mg/l (i.e., a - b). [Not to exceed 5.1 mg/liter]
- f. The average lbs/hour of hydrogen sulfide emitted during each day of sampling (i.e., lbs/hr = 1 lb/453600 mg x 1 liter/0.2642 gal x the maximum daily brine flow rate during the day of sampling, in gal x (e), divided by the minimum number of hours operated per day).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-8940, issued on March 29, 1995: A.IV.2. and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the flow of brine through the stripping tower exceeded 1,728,000 gallons per day.

The permittee shall submit an annual report which indicates the gallons of brine which flowed through the stripping tower for the calendar year. The report shall also indicate the permitted amount of 605,000,000 gallons per year. The report shall be submitted by January 31 of each year and shall be for the previous calendar year.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the pounds per hour or the concentration of hydrogen sulfide removed from the brine did not comply with the requirements for hydrogen sulfide emissions specified above. Each report shall include the calculations of the noncomplying hourly emission rates of hydrogen sulfide based on the hydrogen sulfide concentrations and actual flow rates.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-8940, issued on March 29, 1995: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation
3.07 lbs/hour hydrogen sulfide

Applicable Compliance Method
Compliance shall be determined based upon the record keeping specified in A.III.2.f.

3. Operational Restriction
The maximum brine flow rate to the stripping tower shall be 1,728,000 gallons per day. The maximum annual flow of brine to the stripping tower shall be 605,000,000 gallons per year.

Applicable Compliance Method
Compliance with the daily restriction shall be determined based upon the record keeping specified in A.III.2.d. The annual restriction shall be determined by summing the daily flows.

V. Testing Requirements (continued)

4. Operational Restriction
The maximum concentration of hydrogen sulfide emitted shall not exceed 5.1 mg per liter of brine.

Applicable Compliance Method

Compliance shall be determined based upon the record keeping specified in A.III.2.e.

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>
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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: Block Press System (P007)

Activity Description: Block Press System - block press, brick press, spool press

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>
20.5 tons per hour block press system controlled by a 14,800 acfm Trimer 140-H Whirl wet, wet scrubber.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions not to exceed 20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(B)	The block press, brick press, spool press including all the conveyors and transfer points shall be vented to the wet scrubber, which shall emit no more than 10.9 pounds of particulate emissions (PE) per hour in the exhaust gases.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08 (B) is not applicable to this emissions unit.

II. Operational Restrictions

- While the emissions unit is in operation, the pressure drop across the scrubber shall be maintained within the manufacturer's recommended range of 5 to 11 inches of water.
- The scrubbing liquid flow rate to the wet scrubber shall not be less than the rate (in gallons per minute per 1000 cubic feet of exhaust gases) determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor and record the scrubbing liquid flow rate and the change in pressure of the gas stream across the scrubber while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the differential air pressure across the scrubber, in inches of water;
- b. the scrubbing liquid flow rate to the wet scrubber, in gpm/1000 cubic feet of exhaust gases; and
- c. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during inspections.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the scrubber did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the liquid flow rate to the scrubber did not comply with the allowable rate specified above.

V. Testing Requirements

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

Applicable Compliance Method
OAC rule 3745-17-03 (B)(1), if requested.
 - 1.b Emission Limitation
10.9 pounds of particulate emissions (PE) per hour

Applicable Compliance Method
OAC rule 3745-17-03 (B)(10)

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the applicable emissions limitation of 10.9 pounds of particulate emissions (PE) per hour in the exhaust gases. The test shall also establish the proper differential air pressure across the scrubber and the scrubbing liquid flow rate to the wet scrubber .
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The tests shall be conducted while all the equipment comprising this emissions unit are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - e. A particulate emissions test also shall be conducted at the inlet of the control device to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 of 40 CFR Part 60, Appendix A shall be employed.
3. 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 Northeast 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>
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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: Prod. Convey. Equip. (P008)

Activity Description: South end of 3rd Floor Mill - bucket elevators, conveyors, and screens

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>
South end of third floor mill - bucket elevators, conveyors, and screens, controlled by three parallel fabric filters (12,500 acfm Torit HPT 160, 12,300 acfm Torit HPT 161 and 7,100 acfm Torit HPT 80)	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the control device exhaust shall not to exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The south end of the third floor mill including all the bucket elevators, conveyors, and screens shall be vented to three fabric filters. Particulate emissions in the exhaust gas from the 12,500 acfm Torit HPT 160 shall not exceed 11.9 lbs/hr. Particulate emissions in the exhaust gas from the 12,300 acfm Torit HPT 161 shall not exceed 11.7 lbs/hr. Particulate emissions in the exhaust gas from the 7,100 acfm Torit HPT 80 shall not exceed 7.8 lbs/hr.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08 (B) is not applicable to this emissions unit.
- 2.b If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II is more stringent than 31.4 lbs/hour, the permittee shall comply with the more stringent limitation.

II. Operational Restrictions

1. While the emissions unit is in operation, the pressure drop across each baghouse shall be maintained within the manufacturer's recommended range of 1 to 6 inches of water.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the baghouses while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The differential air pressure across the baghouse, in inches of water.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each baghouse did not comply with the allowable range specified above.

V. Testing Requirements

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

- 1.a Emission Limitation
Visible particulate emissions not to exceed 20% opacity as a six-minute average

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

- 1.b Emission Limitation
Particulate emissions from the Torit HPT 160 shall not exceed 11.9 lbs/hr. Particulate emissions from the Torit HPT 161 shall not exceed 11.9 lbs/hr. Particulate emissions from the Torit HPT 80 shall not exceed 7.8 lbs/hr.

Applicable Compliance Method
OAC rule 3745-17-03(B)(10).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing on each baghouse shall be conducted within three months of the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the applicable emissions limitation of 24 pounds of particulate emissions (PE) per hour in the exhaust gases.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates: Method 5, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The tests shall be conducted while all the equipment comprising this emissions unit are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - e. A particulate emissions tests also shall be conducted at the inlet of the control device to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 of 40 CFR Part 60, Appendix A shall be employed.

V. Testing Requirements (continued)

3. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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>
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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: 3rd Flr Mill Screening (P009)

Activity Description: 3rd Flr Mill screening; 2nd Flr packaging; bucket elevators, conveyors, and screens

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>
Third floor mill screening and second floor packaging systems, bucket elevators, conveyors, screens, with a negative-pressure, pulse-jet, 12,200 acfm Carter-Day fabric filter and a 10,045 acfm Trimer 100-8 Whirl-wet, wet scrubber.	40 CFR 60 Subpart 000	The Third Floor mill Screening and Second Floor packaging systems, the bucket elevators and conveyors, and associated screening operation shall all be vented to two parallel control devices from which the particulate emissions (PE) shall not exceed 0.05 gram PE per dry standard cubic feet. Particulate emissions in the exhaust of the fabric filter and wet scrubber shall not exceed 7 percent opacity, based on a six-minute average. There shall be no visible fugitive dust emissions from any building enclosing any transfer point on any conveyor belt or affected operation. There shall be no visible fugitive dust emissions from any vent from any building enclosing any transfer point on an elevator, conveyor, or belt which exceed 7% opacity.
	OAC rule 3745-17-11(B)(2)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.
	OAC rule 3745-31-05(A)(3) (PTI # 02-2205)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.
	OAC rule 3745-17-08(B)	See A.I.2.a.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)(1)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.

II. Operational Restrictions

1. The pressure differential across the Carter-Day fabric filter shall be maintained within a range of 4 to 7 inches water while the emissions unit is in operation. The pressure differential across the Trimer wet scrubber shall be maintained within a range of 5 to 11 inches water while the emissions unit is in operation.
2. The wet scrubbing liquid flow rate to the wet scrubber shall be maintained at not less than 20 gallons per minute per 1000 cubic feet of air flow.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-2205, issued on June 24, 1998: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall properly operate and maintain equipment to monitor and record the scrubbing liquid flow rate and the change in pressure of the gas stream across the fabric filter and the wet scrubber while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the differential air pressure across the baghouse and the wet scrubber;
- b. the scrubbing liquid flow rate to the wet scrubber, in gpm/1000 cubic feet of exhaust gasses; and
- c. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

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

3. The permittee shall perform daily checks for any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and from the building housing 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 location of the visible emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02 - 2205, issued on June 24, 1998: A.IV.2. and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above;
 - b. all periods of time during which the pressure drop across the wet scrubber did not comply with the allowable range specified above; and
 - c. all periods of time during which the liquid flow rate to the wet scrubber did not comply with the allowable flow rate specified above.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and/or from the building housing this emissions unit were observed and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-2205, issued on June 24, 1998: A.V.2. and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

2.a Emission Limitation

No visible fugitive dust emissions from any building enclosing any transfer point on a conveyor belt or any other affected operation.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 22 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

2.b Emission Limitation

There shall be no visible fugitive dust emissions from any vent of any building enclosing any transfer point on a conveyor belt or elevator which exceed 7% opacity.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 9 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

2.c Emission Limitation

The particulate emissions (PE) from the two parallel control devices shall not exceed 0.05 gram PE per dry standard cubic meter of exhaust gases.

Applicable Compliance Method

OAC rule 3745-17-03(B)(10), if requested.

2.d Emission Limitation

Particulate emissions from the the exhaust of the control devices shall not exceed 7 percent opacity, based on a six-minute average.

Applicable Compliance Method

Method 9 and the procedures in 40 CFR 60.675 (c)-(f) shall be used to determine opacity, if requested.

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>
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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: 4th Flr Blended Salt (P010)

Activity Description: 4th Floor Bended Salt System: Bulk storage of blended salt

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>
Fourth floor blended salt system with 15,000 acfm negative pressure pulse-jet baghouse	OAC rule 3745-17-07(A)(1)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.
	OAC rule 3745-17-11(B)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.
	OAC rule 3745-31-05(A)(3) (PTI No. 02-13,921)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR 60 Subpart 000	The fourth floor blended salt system and the bulk storage of said salt shall all be vented to a fabric filter, from which the particulate emissions (PE) shall not exceed 0.05 gram PE per dry standard cubic meter of exhaust gases. Visible emissions from the fabric filter stack shall not exceed 7% opacity, based on a 6-minute average. There shall be no visible fugitive dust emissions from any building enclosing any transfer point on any conveyor belt or affected operation. There shall be no visible fugitive dust emissions from any vent of any building enclosing any transfer point on an elevator, conveyor, or belt which exceed 7% opacity.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-13,921, issued on April 26, 2000: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the fabric filter while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The differential air pressure across the baghouse.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

3. The permittee shall perform daily checks for any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and from the building housing 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 location of the visible emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02 -13921, issued on April 26, 2000: A.IV.2. and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across each baghouse did not comply with the allowable range specified above.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and/or from the building housing this emissions unit were observed and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-13921, issued on April 26, 2000: A.V.2., A.V.3., and A.V.4. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

2.a Emission Limitation

No visible fugitive dust emissions from any building enclosing any transfer point on a conveyor belt or any other affected operation.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 22 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

2.b Emission Limitation

There shall be no visible fugitive dust emissions from any vent of any building enclosing any transfer point on a conveyor belt or elevator which exceed 7% opacity.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 9 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

2.c Emission Limitation

The particulate emissions (PE) from the fabric filter shall not exceed 0.05 gram PE per dry standard cubic meter of exhaust gases.

Applicable Compliance Method

OAC rule 3745-17-03(B)(10), if requested.

2.d Emission Limitation

Stack emissions from the fabric filters shall not exceed 7 percent opacity, based on a six-minute average.

Applicable Compliance Method

Method 9 and the procedures in 40 CFR 60.675 (c)-(f) shall be used to determine opacity, if requested.

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within ninety days of the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the limitation of 0.05 gram per dry standard cubic meter of exhaust gases from the stack of the fabric filter. This is the same as 0.021 grain per dry standard cubic foot. Based upon 15,000 cubic feet per minute, this is 2.7 pounds PE per hour.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5 or 17. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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.

The sample volume shall be at least 1.70 dry standard cubic meters (60 dry standard cubic feet). For Method 5, if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at a temperature high enough, but no higher than 121 degrees Centigrade (250 degrees Fahrenheit), to prevent water condensation on the filter.

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 Northeast 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>
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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: 4th Flr Auxilliary (P011)
Activity Description: Seasoned Salt Line; TM bagging; Meat Cure product packaging

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>
Seasoned salt - fourth floor aux. & TM bagging supply system 1 of 3, controlled by a 11,160 acfm Trimer wet scrubber.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the seasoned salt line, TM bagging, meat cure product packaging shall not to exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05(A)(3) (PTI # 02-1798)	The seasoned salt line, TM bagging, and meat cure product packaging shall all be vented to the wet scrubber and shall not exceed 0.02 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases.
	OAC rule 3745-17-08(B)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07. See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08 (B) is not applicable to this emissions unit.

II. Operational Restrictions

1. The pressure differential across the wet scrubber shall be maintained within the range of 5 to 11 inches of water while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The scrubbing liquid flow rate to the wet scrubber shall not be less than the rate (in gallons per minute per 1000 cubic feet of exhaust gases) determined during the last emissions test that demonstrated the emissions unit was in compliance with the allowable particulate emissions rate.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02 -1798, issued on December 28, 1984: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall properly operate and maintain equipment to monitor and record the liquid flow rate to the wet scrubber and the change in pressure of the gas stream across the wet scrubber while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the differential air pressure across the wet scrubber, on daily basis;
- b. the liquid flow rate to the wet scrubber, in gpm/1000 cubic feet of exhaust gases;
- c. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-1798, issued on December 28, 1984: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which:
 - a. the pressure drop across the wet scrubber did not comply with the allowable range specified above; and
 - b. the liquid flow rate was less than the flow rate specified above.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02 - 1798, issued on December 28, 1984: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 2.a Emission Limitation
20% opacity as a six-minute average, except as provided by rule

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

V. Testing Requirements (continued)

- 2.b** Emission Limitation
0.02 grain per dry standard cubic foot DSCF of exhaust.
- Applicable Compliance Method
OAC rule 3745-17-03(B)(10).
- 3.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within six months of issuance of the final permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the applicable emissions limitation of 0.02 grain per dry standard cubic foot of exhaust.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): RM 1 - 5. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- 4.** 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 Northeast 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>
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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: 4th Flr Pellet System (P013)

Activity Description: Pelletized salt products: Elevators, screens, conveyors, crushers, bins.

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>
Fourth floor pellet system - elevators, screens, conveyors, crushers, bins with 22,000 acfm negative pressure pulse-jet MAC baghouse	OAC rule 3745-17-07(A)(1)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.
	OAC rule 3745-17-11(B)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.
	40 CFR 60.670, Subpart 000	<p>The fourth floor pellet system elevators, screens, conveyors, crushers, and bins shall all be vented to a fabric filter, from which the particulate emissions (PE) shall not exceed 0.05 gram particulate emissions (PE) per dry standard cubic meter of exhaust gases.</p> <p>Stack emissions from the fabric filter shall not exceed 7% opacity, based on a six-minute average.</p> <p>There shall be no visible fugitive dust emissions from any building enclosing any transfer point on any conveyor belt or affected operation.</p> <p>There shall be no visible fugitive emissions from any vent of any building enclosing any transfer point on an elevator, conveyor, or belt which exceed 7% opacity.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A)(3) (PTI # 02 - 1571)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart OOO.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-18-08(B) is not applicable to this emissions unit.

II. Operational Restrictions

1. The pressure differential across the fabric filter shall be maintained within the range of 1 to 6 inches water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02 - 1571, issued on October 8, 1997: A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the fabric filter while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The differential air pressure across the baghouse.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

3. The permittee shall perform daily checks for any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and from the building housing 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 location of the visible emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02 - 1571, issued on October 8, 1997: A.IV.2. and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and/or from the building housing this emissions unit were observed and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-1571, issued on October 8, 1997: A.V.2. and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

2.a Emission Limitation

No visible fugitive dust emissions from any building enclosing any transfer point on a conveyor belt or any other affected operation.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 22 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

V. Testing Requirements (continued)

2.b Emission Limitation

There shall be no visible fugitive dust emissions from any vent of any building enclosing any transfer point on a conveyor belt or elevator which exceed 7% opacity.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 9 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

2.c Emission Limitation

The particulate emissions (PE) from the fabric filter shall not exceed 0.05 grams PE per dry standard cubic meter of exhaust gases.

Applicable Compliance Method

OAC rule 3745-17-03(B)(10), if requested.

2.d Emission Limitation

Stack emissions from the fabric filters shall not exceed 7 percent opacity, based on a six-minute average.

Applicable Compliance Method

Method 9 and the procedures in 40 CFR 60.675 (c)-(f) shall be used to determine opacity, if requested.

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>
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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: 2nd Flr Pellet System (P014)

Activity Description: Pelletized salt products: pellet presses and conveyors

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>
Second floor pellet presses and conveyors with 21,000 acfm negative pressure pulse-jet MAC baghouse	OAC rule 3745-17-07(A)(1)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.
	OAC rule 3745-17-11(B)(2)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.
	OAC rule 3745-31-05(A)(3) (PTI # 02-2713)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR, Subpart 000.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR 60.670 (Subpart OOO)	The second floor pellet presses and conveyors shall all be vented to a fabric filter, from which the particulate emissions (PE) shall not exceed 0.05 gram PE per dry standard cubic meter of exhaust gases. Visible emissions from the fabric filter stack shall not exceed 7% opacity, based on a 6-minute average There shall be no visible fugitive dust emissions from any building enclosing any transfer point on any conveyor belt or affected operation. There shall be no visible fugitive dust emissions from any vent of any building enclosing any transfer point on an elevator, conveyor, or belt which exceed 7% opacity.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-2713, issued on April 14, 1999: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the baghouse while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The differential air pressure across the baghouse.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

3. The permittee shall perform daily checks for any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and from the building housing 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 location of the visible emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02 - 2713, issued on April 14, 1999: A.IV.2. and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly 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.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and/or from the building housing this emissions unit were observed and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-2713, issued on April 14, 1999: A.V.2. and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

2.a Emission Limitation

No visible fugitive dust emissions from any building enclosing any transfer point on a conveyor belt or any other affected operation.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 22 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

2.b Emission Limitation

There shall be no visible fugitive dust emissions from any vent of any building enclosing any transfer point on a conveyor belt or elevator which exceed 7% opacity.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 9 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

2.c Emission Limitation

The particulate emissions (PE) from the fabric filter shall not exceed 0.05 grams PE per dry standard cubic meter of exhaust gases.

Applicable Compliance Method

OAC rule 3745-17-03(B)(10), if requested.

2.d Emission Limitation

Stack emissions from the baghouse shall not exceed 7 percent opacity, based on a six-minute average.

Applicable Compliance Method

Method 9 and the procedures in 40 CFR 60.675 (c)-(f) shall be used to determine opacity, if requested.

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>
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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: Rotary Conditioner (P016)
Activity Description: Rotary conditioner used for cooling bulk salt

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>
37.5 tons per hour rotary salt conditioner with 8,000 acfm tray type wet scrubber	OAC rule 3745-17-11(B)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) (PTI # 02-2642)	The rotary conditioner shall exhaust into the wet scrubber, which shall emit no more than 0.02 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases.
	OAC rule 3745-17-08(B)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07. See A.I.2.a.

2. Additional Terms and Conditions

- 2.a. This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.

II. Operational Restrictions

1. The pressure drop across the wet scrubber shall be maintained at a value of 2 to 5 inches of water while the emissions unit is in operation.
2. The scrubbing liquid flow rate to the wet scrubber shall be maintained at not less than 2.5 gallons per minute per 1000 cubic feet of exhaust gases.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02 - 2642, issued on June 25, 1986: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the scrubber while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The differential air pressure across the scrubber.
- b. The scrubbing liquid flow rate to the wet scrubber, in gpm/1000 cubic feet of exhaust gases.
- c. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-2642, issued on June 25, 1986: A.IV.2. and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the scrubber did not comply with the allowable range specified above.
3. The permittee shall submit quarterly scrubber flow rate (excursion) reports that identify all periods of time during which the liquid flow rate to the scrubber did not comply with the allowable rate specified above.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-2642, issued on June 25, 1986: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 2.a Emission Limitation
20% opacity as a six-minute average, except as provided by rule

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

V. Testing Requirements (continued)

- 2.b** Emission Limitation
0.02 grain per dry standard cubic foot DSCF of exhaust.
- Applicable Compliance Method
OAC rule 3745-17-03(B)(10).
- 3.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within six months of issuance of the final permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the applicable emissions limitation of 0.02 grain per dry standard cubic foot of exhaust.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): RM 1 - 5. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

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 Northeast 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>
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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: 999 Storage System (P019)

Activity Description: High Purity Salt Storage and Handling System: Bins, elevators, conveyors, and screens

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>
45 tons per hour high purity salt storage and handling system- bins, elevators, conveyors, and screens with 8,000 cfm negative pressure, pulse-jet MAC baghouse	OAC rule 3745-17-07(A)(1)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR 60, Subpart OOO.
	OAC rule 3745-17-11(B)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to 40 CFR 60, Subpart OOO.
	OAC rule 3745-31-05(A)(3) (PTI No. 02-8438)	1.44 lbs particulate emissions (PE) per hour
	40 CFR 60.670 (Subpart OOO)	The high purity salt storage and handling system- bins, elevators, conveyors, and screens shall all be vented to a fabric filter, from which the particulate emissions (PE) shall not exceed 0.05 gram PE per dry standard cubic meter of exhaust gases.
		Stack emissions from the fabric filter shall not exceed 7% opacity, based on a 6-minute average.
		There shall be no visible fugitive dust emissions from any building enclosing any transfer point on any conveyor belt or affected operation.
		There shall be no visible fugitive dust emissions from any vent of any building enclosing any transfer point on an elevator, conveyor, or belt which exceed 7% opacity.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-8438, issued on September 14, 1994: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the baghouse while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The differential air pressure across the baghouse.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

3. The permittee shall perform daily checks for any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and from the building housing 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 location of the visible emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-8438, issued on September 14, 1994: A.IV.2. and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly 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.

IV. Reporting Requirements (continued)

3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions of fugitive dust from any of the equipment comprising this emissions unit and/or from the building housing this emissions unit were observed and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-8438, issued on September 14, 1994: A.V.2. and A.V.3. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

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

2.a Emission Limitation

No visible fugitive dust emissions from any building enclosing any transfer point on a conveyor belt or any other affected operation.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 22 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

2.b Emission Limitation

There shall be no visible fugitive dust emissions from any vent of any building enclosing any transfer point on a conveyor belt or elevator which exceed 7% opacity.

Applicable Compliance Method

Within 6 months of the effective date of this permit the permittee shall use Method 9 and the procedures in 40 CFR Subsection 60.11, to determine compliance with this standard. Alternatively, the permittee may use the methods described in 40 CFR Subsection 60.676(e) to demonstrate compliance.

The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof being observed for at least 15 minutes.

The permittee shall notify the Northeast District Office of the Ohio Environmental Protection Agency thirty days prior to the scheduled observations. Personnel from the Northeast District Office of the Ohio Environmental Protection Agency shall be permitted to witness the observations.

2.c Emission Limitation

The particulate emissions (PE) from the fabric filter shall not exceed 0.05 gram PE per dry standard cubic meter of exhaust gases and 1.44 pounds PE per hour.

Applicable Compliance Method

OAC rule 3745-17-03(B)(10), if requested.

V. Testing Requirements (continued)

2.d Emission Limitation
Stack emissions from the fabric filters shall not exceed 7 percent opacity, based on a six-minute average.

Applicable Compliance Method
Method 9 and the procedures in 40 CFR 60.675 (c)-(f) shall be used to determine opacity, if requested.

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>
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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: High Purity Salt Packaging System (P028)

Activity Description: Automated packaging system for high purity and granulated salt products

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>
48.5 tons per hour automated packaging system for high purity and granulated salt products with 6,000 cfm negative pressure, pulse-jet MAC baghouse	OAC rule 3745-17-07(A)(1)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-17-11(B)	The requirements established pursuant to this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05(A)(3) (PTI No. 02-9179)	The automated packaging system, belts, and elevators shall all vent into the baghouse, from which particulate emissions (PE) shall not exceed 0.02 grain per dscf and 1.0 pound per hour.
	OAC rule 3745-17-08(B)	There shall be no visible emissions from the exhaust gases of the baghouse. See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.

II. Operational Restrictions

1. The pressure differential across the baghouse shall be maintained within the range of 0.5 to 4 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 02-9179, issued on January 24, 1996: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the baghouse while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The differential air pressure across the baghouse.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

3. The permittee shall perform daily checks for any visible emissions from the baghouse exhaust stack. 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 total duration of any visible emission incident; and
 - b. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-9179, issued on January 24, 1996: A.IV.2. and A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly 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.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions from the baghouse exhaust stack were observed and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-9179, issued on January 24, 1996: A.V.2., A.V.3., and A.V.4. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

2.a Emission Limitation

There shall be no visible particulate emissions in the exhaust gases from the baghouse.

Applicable Compliance Method

OAC rule 3745-17-03(B)(1), if requested

2.b Emission Limitation

0.02 grain per dscf and 1.0 lbs PE per hour from the exhaust gases of the baghouse.

Applicable Compliance Method

OAC rule 3745-17-03(B)(10), if requested.

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within six months of issuance of the final permit.

b. The emission testing shall be conducted to demonstrate compliance with the applicable emissions limitations of 0.02 grain per dscf and 1.0 pound per hour.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): RM 1 - 5. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

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 Northeast 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>
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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: Entoleter Pulverizer (P029)

Activity Description: Salt Pulverized, conveyors

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>
5 tons per hour salt pulverizer and conveying with a 2,500 acfm Pneumatic, dry type collector in series with a BACT Engineering, tray type wet scrubber.	OAC rule 3745-17-11(B)	The pulverizer, belts, conveyors, and elevators shall all be vented to the wet scrubber, from which the particulate emissions (PE) shall not exceed 13.4 pounds per hour
	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.

II. Operational Restrictions

- The pressure drop across the wet portion of the combination collector shall be maintained within the range of 10 to 15 inches of water while the emissions unit is in operation.
- The scrubbing liquid flow rate to the wet scrubber must be maintained at not less than 2.0 gallons per minute per 1000 cubic feet of exhaust gasses.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor and record the change in pressure of the gas stream across the scrubber while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the pressure differential across the scrubber, in inches of water;
- b. the scrubbing liquid flow rate to the wet scrubber, in gpm/1000 cubic feet of exhaust gases; and
- c. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the scrubber did not comply with the allowable range specified above.
2. The permittee shall submit quarterly scrubber flow rate (excursion) reports that identify all periods of time during which the liquid flow rate to the scrubber did not comply with the allowable rate specified above.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation
13.4 lbs particulate emissions (PE) per hour

Applicable Compliance Method
OAC rule 3745-17-03(B)(10), if requested.

V. Testing Requirements (continued)

- 1.b** Emission Limitation
Visible particulate emissions not to exceed 20% opacity as a six-minute average
- Applicable Compliance Method
OAC rule 3745-17-03(B)(1), if requested.
- 2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within three months of the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the applicable emissions limitation of 13.4 pounds of PE per hour. The test shall also establish the proper differential air pressure across the scrubber and the scrubbing liquid flow rate to the wet scrubber.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates: Method 5, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. A particulate emissions test also shall be conducted at the inlet of the control device to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 of 40 CFR Part 60, Appendix A shall be employed.

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>
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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: 999 Salt Fluid Bed Dryer (P030)
Activity Description: High purity salt drying process.

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>
Salt fluidized bed dryer and associated conveyors controlled by a 11,500 acfm cyclone and wet scrubber.	OAC rule 3745-31-05(A)(3) PTI 02-9978	See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07.
	OAC rule 3745-17-07(A)(1)	See A.I.2.b below.
	OAC rule 3745-17-11(B)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Particulate emissions (PE) from the control device exhaust shall not exceed 0.015 gr/dscf and 1.5 pounds per hour.
- 2.b Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.

II. Operational Restrictions

1. The pressure drop across the wet scrubber shall be maintained within the range of 0.5 to 6 inches of water while the emissions unit is in operation.
2. The water flow rate to the wet scrubber shall be maintained according to the manufacturer's recommended flow rate 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 and record the change in pressure of the gas stream across the scrubber and the water flow rate of the scrubber while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the pressure differential across the scrubber, in inches of water;
- b. the scrubbing liquid flow rate to the wet scrubber, in gpm/1000 cubic feet of exhaust gases; and
- c. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The information required above shall be maintained in a logbook associated with this emissions unit and shall be made available upon request during future inspections.

2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the scrubber did not comply with the allowable range specified above.
2. The permittee shall submit quarterly scrubber flow rate (excursion) reports that identify all periods of time during which the liquid flow rate to the scrubber did not comply with the allowable rate specified above.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation
.015 gr/dscf and 1.5 lbs particulate emissions (PE) per hour

Applicable Compliance Method
OAC rule 3745-17-03(B)(10), if requested.

V. Testing Requirements (continued)

- 1.b** Emission Limitation
Visible particulate emissions not to exceed 20% opacity as a six-minute average

Applicable Compliance Method

Compliance shall be determined according to OAC rule 3745-17-03(B)(1), (40 CFR 60, Appendix A, Method 9).

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>
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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: North Filter Wheel (P031)
Activity Description: Used for drying granulated salt

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>
68,000 pounds per hour rotary salt dryer with multiclone and water sprays	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B) Figure II	75.0 pounds particulate emissions (PE) per hour (See A.I.2.c.)
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.
- 2.b The emissions from this emissions unit exhaust into the multiclone and then into the "mystery tunnel". The tunnel runs horizontally through the middle of this part of the plant. The tunnel is at least two stories high (one story above ground and at least one story below ground). At both ends of the tunnel, there is a ninety degree turn upwards. At both turns, there is a fan to push/pull the air (and salt emissions) around the turn. The tunnel then runs vertically along each end of the plant until it emerges above the roof, as a square brick stack with water sprays on both of the stacks. The water from the sprays drains into a drain in the center of the tunnel and then flows into a basin in the well field, the second holding pond. At that point the water is about 10% saturated with salt. This water is then injected into the well, making up part of the solution in the mining process.
- 2.c If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II is more stringent than 75 lbs/hour, the permittee shall comply with the more stringent limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the tunnel stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the tunnel stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
75.0 pounds particulate emissions per hour

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(10)
 - 1.b 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.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 75 lb PE per hour in accordance with the following requirements:

The particulate emission testing shall be conducted at the outlet of the multiclone within three months of the effective date of this permit and within six months prior to the expiration of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

A particulate emissions test also shall be conducted at the inlet of the multiclone to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 of 40 CFR Part 60, Appendix A shall be employed.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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>
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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: Middle Filter Wheel (P032)
Activity Description: Used for drying granulated salt

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>
68,000 pounds per hour rotary salt dryer with multiclone and water sprays	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	75.0 pounds particulate emissions (PE) per hour (See A.I.2.c.)
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.
- 2.b The emissions from this emissions unit exhaust into the multiclone and then into the "mystery tunnel". The tunnel runs horizontally through the middle of this part of the plant. The tunnel is at least two stories high (one story above ground and at least one story below ground). At both ends of the tunnel, there is a ninety degree turn upwards. At both turns, there is a fan to push/pull the air (and salt emissions) around the turn. The tunnel then runs vertically along each end of the plant until it emerges above the roof, as a square brick stack with water sprays on both of the stacks. The water from the sprays drains into a drain in the center of the tunnel and then flows into a basin in the well field, the second holding pond. At that point the water is about 10% saturated with salt. This water is then injected into the well, making up part of the solution in the mining process.
- 2.c If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II is more stringent than 75 lbs/hour, the permittee shall comply with the more stringent limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the tunnel stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the tunnel stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
75.0 pounds particulate emissions per hour

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(10)
 - 1.b 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.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 75 lb PE per hour in accordance with the following requirements:

The particulate emission testing shall be conducted at the outlet of the multiclone within three months of the effective date of this permit and within six months prior to the expiration of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

A particulate emissions test also shall be conducted at the inlet of the multiclone to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 of 40 CFR Part 60, Appendix A shall be employed.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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>
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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: South Filter Wheel (P033)
Activity Description: Used for drying high purity salt

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>
50,000 pounds per hour rotary salt dryer with multiclone and water sprays	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	75.0 pounds particulate emissions (PE) per hour (See A.I.2.c.)
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.
- 2.b The emissions from this emissions unit exhaust into the multiclone and then into the "mystery tunnel". The tunnel runs horizontally through the middle of this part of the plant. The tunnel is at least two stories high (one story above ground and at least one story below ground). At both ends of the tunnel, there is a ninety degree turn upwards. At both turns, there is a fan to push/pull the air (and salt emissions) around the turn. The tunnel then runs vertically along each end of the plant until it emerges above the roof, as a square brick stack with water sprays on both of the stacks. The water from the sprays drains into a drain in the center of the tunnel and then flows into a basin in the well field, the second holding pond. At that point the water is about 10% saturated with salt. This water is then injected into the well, making up part of the solution in the mining process.
- 2.c If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II is more stringent than 75 lbs/hour, the permittee shall comply with the more stringent limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the tunnel stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the tunnel stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
75.0 pounds particulate emissions per hour

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(10)
 - 1.b 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.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 75 lb PE per hour in accordance with the following requirements:

The particulate emission testing shall be conducted at the outlet of the multiclone within three months of the effective date of this permit and within six months prior to the expiration of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

A particulate emissions test also shall be conducted at the inlet of the multiclone to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 of 40 CFR Part 60, Appendix A shall be employed.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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>
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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: Granulated Cascade Cooler (P034)

Activity Description: Used for cooling granulated salt off the filter wheels

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>
68,000 pounds per hour cascade cooler with multiclone and water sprays	OAC rule 3745-17-11(B)	14.6 pounds particulate emissions (PE) per hour (See A.I.2.c.)
	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity as a six minute average, except as provided by rule.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.
- 2.b The emissions from this emissions unit exhaust into the multiclone and then into the "mystery tunnel". The tunnel runs horizontally through the middle of this part of the plant. The tunnel is at least two stories high (one story above ground and at least one story below ground). At both ends of the tunnel, there is a ninety degree turn upwards. At both turns, there is a fan to push/pull the air (and salt emissions) around the turn. The tunnel then runs vertically along each end of the plant until it emerges above the roof, as a square brick stack with water sprays on both of the stacks. The water from the sprays drains into a drain in the center of the tunnel and then flows into a basin in the well field, the second holding pond. At that point the water is about 10% saturated with salt. This water is then injected into the well, making up part of the solution in the mining process.
- 2.c If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II is more stringent than 14.6 lbs/hour, the permittee shall comply with the more stringent limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the tunnel stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the tunnel stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
14.6 pounds particulate emissions per hour

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(10)
 - 1.b 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.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 75 lb PE per hour in accordance with the following requirements:

The particulate emission testing shall be conducted at the outlet of the multiclone within three months of the effective date of this permit and within six months prior to the expiration of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

A particulate emissions test also shall be conducted at the inlet of the multiclone to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 of 40 CFR Part 60, Appendix A shall be employed.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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>
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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: 999 Cascade Cooler (P035)

Activity Description: Used for cooling high purity salt off the South Filter Wheel.

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>
34,000 pounds per hour cascade cooler with multiclone and water sprays	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity as a six minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. 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, Table I of OAC rule 3745-17-11 does not apply to existing emissions units located in Wayne County. Therefore, to ensure that Figure II will not be applicable, the uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.
- 2.b The emissions from this emissions unit exhaust into the multiclone and then into the "mystery tunnel". The tunnel runs horizontally through the middle of this part of the plant. The tunnel is at least two stories high (one story above ground and at least one story below ground). At both ends of the tunnel, there is a ninety degree turn upwards. At both turns, there is a fan to push/pull the air (and salt emissions) around the turn. The tunnel then runs vertically along each end of the plant until it emerges above the roof, as a square brick stack with water sprays on both of the stacks. The water from the sprays drains into a drain in the center of the tunnel and then flows into a basin in the well field, the second holding pond. At that point the water is about 10% saturated with salt. This water is then injected into the well, making up part of the solution in the mining process.

2. Additional Terms and Conditions (continued)

- 2.c** If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II is more stringent than 10 lbs/hour, the permittee shall comply with the more stringent limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the tunnel stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the tunnel stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a** Emission Limitation:
less than 10 pounds particulate emissions per hour

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(10)
 - 1.b** 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.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 75 lb PE per hour in accordance with the following requirements:

The particulate emission testing shall be conducted at the outlet of the control device within three months of the effective date of this permit and within six months prior to the expiration of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

A particulate emissions test also shall be conducted at the inlet of the control device to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 of 40 CFR Part 60, Appendix A shall be employed.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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>
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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: Entoleter - 1st Floor Station (P036)
Activity Description: Pulverized salt bagging station

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>
10,000 lbs/hour pulverized salt bagging station with water sprays	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity as a six minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. 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, Table I of OAC rule 3745-17-11 does not apply to existing emissions units located in Wayne County. Therefore, to ensure that Figure II will not be applicable, the uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour.
	OAC rule 3745-17-08(B)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.
- 2.b The emissions from this emissions unit exhaust into the "mystery tunnel". The tunnel runs horizontally through the middle of this part of the plant. The tunnel is at least two stories high (one story above ground and at least one story below ground). At both ends of the tunnel, there is a ninety degree turn upwards. At both turns, there is a fan to push/pull the air (and salt emissions) around the turn. The tunnel then runs vertically along each end of the plant until it emerges above the roof, as a square brick stack with water sprays on both of the stacks. The water from the sprays drains into a drain in the center of the tunnel and then flows into a basin in the well field, the second holding pond. At that point the water is about 10% saturated with salt. This water is then injected into the well, making up part of the solution in the mining process.

2. Additional Terms and Conditions (continued)

- 2.c** If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II is more stringent than 10 lbs/hour, the permittee shall comply with the more stringent limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the tunnel stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the tunnel stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
less than 10 pounds particulate emissions per hour

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(10)

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of 75 lb PE per hour in accordance with the following requirements:

The particulate emission testing shall be conducted at the outlet of the control device within three months of the effective date of this permit and within six months prior to the expiration of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

A particulate emissions test also shall be conducted at the inlet of the control device to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 of 40 CFR Part 60, Appendix A shall be employed.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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>
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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: One and Two Vapor Take-off (P037)

Activity Description: Vapor take-off fans for granulated and high purity salt off the filter wheels

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>
170,000 lbs/hour vapor take-off fans with water sprays	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity as a six minute average, except as provided by rule. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. 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, Table I of OAC rule 3745-17-11 does not apply to existing emissions units located in Wayne County. Therefore, to ensure that Figure II will not be applicable, the uncontrolled mass rate of particulate emissions is limited to less than 10 pounds per hour. See A.I.2.a.
	OAC rule 3745-17-11(B)	
	OAC rule 3745-17-08(B)	

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area. Therefore, per OAC rule 3745-17-08 (A)(1), OAC rule 3745-17-08(B) is not applicable to this emissions unit.
- 2.b The emissions from this emissions unit exhaust into the "mystery tunnel". The tunnel runs horizontally through the middle of this part of the plant. The tunnel is at least two stories high (one story above ground and at least one story below ground). At both ends of the tunnel, there is a ninety degree turn upwards. At both turns, there is a fan to push/pull the air (and salt emissions) around the turn. The tunnel then runs vertically along each end of the plant until it emerges above the roof, as a square brick stack with water sprays on both of the stacks. The water from the sprays drains into a drain in the center of the tunnel and then flows into a basin in the well field, the second holding pond. At that point the water is about 10% saturated with salt. This water is then injected into the well, making up part of the solution in the mining process.

2. Additional Terms and Conditions (continued)

- 2.c If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II is more stringent than 10 lbs/hour, the permittee shall comply with the more stringent limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the tunnel stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the tunnel stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

Emission Limitation
less than 10 pounds PE per hour

Applicable Compliance Method
OAC rule 3745-17-03(B)(10), if requested.

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate of less than 10 lb PE per hour in accordance with the following requirements:

The particulate emission testing shall be conducted at the outlet of the control device within six months of the effective date of this permit and six months prior to the expiration of the permit.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

A particulate emissions test also shall be conducted at the inlet of the control device to determine the uncontrolled mass rate of emission for the emission unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Method 5 of 40 CFR Part 60, Appendix A shall be employed.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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>
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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

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