



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

8/2/2016

Certified Mail

Mr. Joe Payne  
Cargill, Incorporated - Salt Division (Akron, OH)  
2065 Manchester Road  
Akron, OH 44314-1770

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677010027  
Permit Number: P0119110  
Permit Type: Renewal  
County: Summit

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

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

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: ARAQMD



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Cargill, Incorporated - Salt Division (Akron, OH)**

Facility ID:	1677010027
Permit Number:	P0119110
Permit Type:	Renewal
Issued:	8/2/2016
Effective:	8/2/2016
Expiration:	8/2/2026





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Cargill, Incorporated - Salt Division (Akron, OH)

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. B008, Natural Gas Boiler .....	11
2. F003, Fugitive Dust (Roadways) .....	20
3. P006, Vacuum Pan Salt Dryer .....	23
4. P009, Cooling Tower.....	26
5. P902, DuraCube Production Line.....	30
6. P905, Dairy Mill Operation .....	38
7. P906, Pellet Operation.....	42





**Final Permit-to-Install and Operate**  
Cargill, Incorporated - Salt Division (Akron, OH)  
**Permit Number:** P0119110  
**Facility ID:** 1677010027  
**Effective Date:** 8/2/2016

## Authorization

Facility ID: 1677010027  
Application Number(s): A0053253  
Permit Number: P0119110  
Permit Description: Administrative Modification being processed as a Renewal PTIO to transition the facility from Title V to Non-Title V permitting status. Cargill permanently shut down four existing coal-fired boilers B001-B004 and natural gas-fired boiler B006 to bring the facility's PTE under 100 tpy for regulated pollutants and less than 10 tpy for each individual HAP and 25 tpy total HAPs. Additionally, Cargill is not subject to any major source NESHAP or NSPS standards which require Title V permits.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 8/2/2016  
Effective Date: 8/2/2016  
Expiration Date: 8/2/2026  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Cargill, Incorporated - Salt Division (Akron, OH)  
2065 Manchester Road  
Akron, OH 44314-1770

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

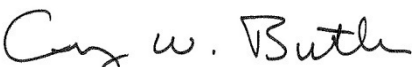
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District  
1867 West Market St.  
Akron, OH 44313  
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director

## Authorization (continued)

Permit Number: P0119110

Permit Description: Administrative Modification being processed as a Renewal PTIO to transition the facility from Title V to Non-Title V permitting status. Cargill permanently shut down four existing coal-fired boilers B001-B004 and natural gas-fired boiler B006 to bring the facility's PTE under 100 tpy for regulated pollutants and less than 10 tpy for each individual HAP and 25 tpy total HAPs. Additionally, Cargill is not subject to any major source NESHAP or NSPS standards which require Title V permits.

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

<b>Emissions Unit ID:</b>	<b>B008</b>
Company Equipment ID:	Natural Gas Boiler
Superseded Permit Number:	P0115784
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Fugitive Dust (roadways)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Vacuum Pan Salt Dryer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P009</b>
Company Equipment ID:	Cooling Tower
Superseded Permit Number:	P0107138
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P902</b>
Company Equipment ID:	DuraCube Production Line
Superseded Permit Number:	16-1523
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P905</b>
Company Equipment ID:	Dairy Mill Operation
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P906</b>
Company Equipment ID:	Pellet Operation
Superseded Permit Number:	16-1117
General Permit Category and Type:	Not Applicable





**Final Permit-to-Install and Operate**  
Cargill, Incorporated - Salt Division (Akron, OH)  
**Permit Number:** P0119110  
**Facility ID:** 1677010027  
**Effective Date:** 8/2/2016

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

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

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

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

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

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

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

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

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

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

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

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

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The following emissions units contained in this permit are subject to the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Db: B008. The complete NSPS requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Akron Regional Air Quality Management District (ARAQMD).
3. The following emissions units contained in this permit are subject to the New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants, 40 CFR Part 60, Subpart OOO: P902 and P906. The complete NSPS requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Akron Regional Air Quality Management District (ARAQMD).

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



**1. B008, Natural Gas Boiler**

**Operations, Property and/or Equipment Description:**

180.97 MMBtu/hr natural gas-fired boiler with a heat release rate of 93.3 MMBtu/hr-ft<sup>3</sup>

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c.

- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)	The permittee shall install a boiler that is designed to achieve 0.10 pound (lb) of nitrogen oxide (NO <sub>x</sub> ) per million British thermal units (MMBtu) of heat input using low NO <sub>x</sub> burners and flue gas recirculation.  The permittee shall install a boiler that is designed to achieve 84 pounds (lbs) of carbon monoxide (CO) per million standard cubic feet (MMscf) of natural gas fired.  See b)(2)a., c)(1) and c)(2) below.
b.	OAC rule 3745-31-05(A)(3), June 30, 2008	The permittee shall install a boiler that is designed to achieve the following:  7.6 lbs of particulate emissions (PE) per MMscf of natural gas fired;  5.5 lbs of volatile organic compounds

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		(VOC) per MMscf of natural gas fired; and  0.6 lb of sulfur dioxide (SO <sub>2</sub> ) per MMscf of natural gas fired.  See b)(2)a., b)(2)b., c)(1) and c)(2) below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), June 30, 2008	See b)(2)c. and c)(1) below.
d.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/MMBtu of actual heat input  The emission limitation specified by this rule is less stringent than the limitation established pursuant to ORC 3704.03(T).  See b)(2)c. below.
f.	OAC rule 3745-18-06(A)	Exempt. See b)(2)d. below.
g.	OAC rule 3745-110-03(C)	0.10 lb NO <sub>x</sub> /MMBtu
h.	40 CFR Part 60, Subpart Db [40 CFR 60.40b - 60.49b]	0.20 lb NO <sub>x</sub> /MMBtu [40 CFR 60.44b(a)(1)(ii)]  The emission limitation specified by this standard is less stringent than the limitation established pursuant to OAC rule 3745-110-03(C).  See b)(2)e. below.
i.	40 CFR Part 60, Subpart A [40 CFR 60.1 - 60.19]	General Provisions.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) are based on the source's design characteristics.
- b. This BAT emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

- c. The following requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP:
- i. the BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, VOC, and SO<sub>2</sub> emissions from this air contaminant source since the potential to emit for each pollutant is less than 10 tons per year; and
  - ii. the requirements of OAC rule 3745-17-10(B)(1) become effective.
- d. Fuel burning equipment is exempt from paragraphs (D), (F) and (G) of this rule and from rules 3745-18-07 to 3745-18-94 of the Administrative Code during any calendar day in which natural gas is the only fuel burned.
- e. In accordance with 40 CFR 60.40b(a), emissions unit B008 is a steam generating unit constructed after June 19, 1984, with a heat input capacity greater than 100 MMBtu/hr, and is subject to the emissions limitations/control measures specified in this section.
- i. Pursuant to 40 CFR 60.42b(k)(2), units firing only gaseous fuel are exempt from the sulfur dioxide (SO<sub>2</sub>) emissions limit in §60.42b(k)(1).
  - ii. Emissions unit B008 is not subject to the particulate matter (PM) emission limits or opacity limits established under 40 CFR 60.43b since coal, oil, wood, or mixtures of these fuels with any other fuels are not combusted in this unit.
  - iii. The permittee shall comply with the applicable standards for nitrogen oxides (NO<sub>x</sub>) required under 40 CFR Part 60, Subpart Db, including the following sections:

60.44b(a)	Standards for NO <sub>x</sub>
60.44b(h) and 60.46b(a)	NO <sub>x</sub> standards apply at all times, including periods of startup, shutdown, or malfunction
60.44b(i)	Compliance with NO <sub>x</sub> emission limits is determined on a 30-day rolling average basis

- f. The permittee shall maintain a written quality assurance/quality control plan for the continuous NO<sub>x</sub> monitoring system, designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative

accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

- g. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in this emissions unit.
- (2) The permittee shall operate and maintain this emissions unit following the manufacturer's recommendations in order to ensure the source continues to operate as designed.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel.
- (2) The permittee shall keep records of any maintenance activities performed on this emissions unit along with the manufacturer's recommendations.
- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 60, Subpart Db, including the following sections:

60.48b(b)(1) and (c) through (f)	Continuous emissions monitoring system (CEMS)
60.48b(g)(2)	Monitoring alternative to CEMS
60.49b(d)(1)	Records of amount of fuel combusted each day and the annual capacity factor calculation
60.49b(g)	Records for units subject to NO <sub>x</sub> standards
60.49b(o)	Record retention period

- (4) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NO<sub>x</sub> monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or Local Air Agency) upon request.
- (5) The permittee shall operate and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

- (6) The permittee shall maintain records of all data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to:
- a. emissions of NO<sub>x</sub> in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
  - b. emissions of NO<sub>x</sub> in units of the applicable standard(s) in the appropriate averaging period;
  - c. results of quarterly cylinder gas audits;
  - d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
  - e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
  - f. hours of operation of the emissions unit, continuous NO<sub>x</sub> monitoring system, and control equipment;
  - g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO<sub>x</sub> monitoring system;
  - h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO<sub>x</sub> monitoring system; as well as,
  - i. the reason (if known) and the corrective actions taken (if any) for each such event in d)(6)g. and h.

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart Db, including the following sections:

60.49b(a)	Initial startup notification
60.49b(b)	Performance test data

60.49b(c)	Plan for monitoring provisions of §60.48b(g)(2)
60.49b(h)	Excess emission reports
60.49b(i)	Reports of information recorded under §60.49b(g)

- (4) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO<sub>x</sub> monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or Local Air Agency, documenting all instances of NO<sub>x</sub> emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous NO<sub>x</sub> and other associated monitors;
    - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
    - iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
    - v. the total NO<sub>x</sub> emissions for the calendar quarter (tons);
    - vi. the total operating time (hours) of the emissions unit;
    - vii. the total operating time of the continuous NO<sub>x</sub> monitoring system while the emissions unit was in operation;
    - viii. results and dates of quarterly cylinder gas audits;
    - ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO<sub>x</sub> monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\*\* of the continuous NO<sub>x</sub> monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime\*\* of the continuous NO<sub>x</sub> monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in e)(4)b.xi. and xii.

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

\*Where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report.

\*\*Each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the allowable stack opacity limitation identified above shall be determined by visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

0.020 lb PE/MMBtu of actual heat input

Applicable Compliance Methods:

Compliance with the allowable particulate emission limitation identified above shall be demonstrated by dividing the emission factor for natural gas combustion of 7.6 lb PE/10<sup>6</sup> scf (AP-42, Table 1.4-2, dated 7/98) by 1,020 to convert to lb/MMBtu.



If required, compliance with the lb PE/MMBtu emission limitation above shall be determined through stack testing performed in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emission Limitation:

0.10 lb NO<sub>x</sub>/MMBtu [OAC rule 3745-110-03(C)]

Applicable Compliance Method:

Compliance with the allowable NO<sub>x</sub> emission limitation identified above shall be determined by a 24-hour daily heat input-weighted average calculated from the data measured and recorded by the continuous emissions monitor required in section d)(3). A 30-day rolling heat input-weighted average emission rate may be used to demonstrate compliance with the emission limit from October 1<sup>st</sup> to April 30<sup>th</sup>.

The permittee shall determine the 24-hour daily heat input-weighted average NO<sub>x</sub> emission rate based on the heat input-weighted average of the block hourly arithmetic average emission rates during each 24-hour daily period from 12 a.m. to 12 a.m. the following day using continuous emissions monitor data. The block hourly heat input-weighted average emission rate must be calculated for each one-hour period starting with the period 12 a.m. to 1 a.m. and continuing through until the last period 11 p.m. to 12 a.m.; or, starting with the period 12 p.m. to 1 p.m. and continuing through the last period 11 a.m. to 12 p.m. The 30-day rolling heat input-weighted average must be the average of the 24-hour daily heat input-weighted NO<sub>x</sub> emission rate.

- (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 180 days after initial startup of the emissions unit. Subsequent emissions testing shall be conducted upon request pursuant to 40 CFR 60.46b(d).
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable NSPS Subpart Db mass emission rate of 0.20 lb NO<sub>x</sub>/MMBtu, in the appropriate averaging period.
  - c. A 30-day performance test using the continuous system for monitoring NO<sub>x</sub> shall be employed to demonstrate compliance with the allowable mass emission rate in accordance with 40 CFR 60.46b(e).
  - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or Local Air Agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the



tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or Local Air Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or Local Air Agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or Local Air Agency.

g) Miscellaneous Requirements

- (1) None.

## 2. F003, Fugitive Dust (Roadways)

### Operations, Property and/or Equipment Description:

Particulate emissions from traffic on paved and unpaved roadways and parking areas.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)(4) [The city of Akron is an area identified in Appendix A of OAC rule 3745-17-08.]	No visible particulate emissions (PE) from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period.
b.	OAC rule 3745-17-07(B)(5) [The city of Akron is an area identified in Appendix A of OAC rule 3745-17-08.]	No visible PE from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period.
c.	OAC rule 3745-17-08(B) [The city of Akron is an area identified in Appendix A of OAC rule 3745-17-08.]	See b)(2)a. below.

(2) Additional Terms and Conditions

- a. The permittee shall employ reasonably available control measures to minimize or eliminate visible particulate emissions of fugitive dust by:
  - i. The periodic application of asphalt, oil (excluding any used oil as defined in paragraph (A)(12) of rule 3745-279-01 of the Administrative Code), water or other suitable dust suppression chemicals on dirt or gravel roads and parking lots, and other surfaces which can cause emissions of fugitive dust.
  - ii. The covering, at all times, of open bodied vehicles when transporting materials likely to become airborne.
  - iii. The prompt removal, in such a manner as to minimize or prevent resuspension, of earth or other material from paved streets onto which earth or other material has been deposited by trucking or earth moving equipment or erosion by water or other means.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform weekly inspections of each paved and unpaved roadway segment and parking area. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient to ensure compliance with the above-mentioned applicable requirements.
- (2) The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(2)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

No visible PE from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period.

No visible PE from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the allowable visible PE limitations listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.

### 3. P006, Vacuum Pan Salt Dryer

#### Operations, Property and/or Equipment Description:

Salt slurry is heated through the use of natural gas fired vacuum pans and a filter drum dryer. The moisture in the salt slurry is evaporated during this operation.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 pound per million Btu (lb/MMBtu) of actual heat input.
c.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 44.6 pounds per hour (lbs/hr). [Appendix Table 1, Maximum process weight rate of 50.0 tons per hour.]

- (2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(1)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in d)(1) above:
  - a. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit; and

- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

- Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

- Applicable Compliance Method:

- If required, compliance with the allowable stack opacity limitation identified above shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:

- 0.020 lb PE/MMBtu of actual heat input

- Applicable Compliance Methods:

- Compliance with the allowable particulate emission limitation identified above shall be demonstrated by dividing the emission factor for natural gas combustion of 7.6 lb PE/10<sup>6</sup> scf (AP-42, Table 1.4-2, dated 7/98) by 1,020 to convert to lb/MMBtu.

- If required, compliance with the lb PE/MMBtu emission limitation above shall be determined through stack testing performed in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(9).

- c. Emission Limitation:

- PE shall not exceed 44.6 lbs/hr

- Applicable Compliance Method:

- If required, compliance with the hourly allowable PE limitation identified above shall be determined through stack testing performed in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.

#### 4. P009, Cooling Tower

##### Operations, Property and/or Equipment Description:

The induced draft cooling tower cools process water.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)b.

- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Particulate emissions (PE) shall not exceed 2.25 pounds per hour (lbs/hr) and 9.86 tons per year (tpy). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A), as effective 11/30/2001. See b)(2)b. below.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
  - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the uncontrolled potential to emit for PE is less than 10 tons/yr.
  - ii. the requirements of OAC rule 3745-17-11(B)(1) become effective: PE shall not exceed 83.0 pounds per hour.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Once per quarter the permittee shall test and record the total dissolved solids (TDS) content of the cooling water, in milligrams per liter (mg/L). The TDS concentration shall be measured using a conductivity meter or other U.S. EPA approved test procedures. If the TDS concentration of the cooling water is greater than 13,500 mg/L, then the monitoring frequency shall be increased to weekly. After eight consecutive weeks with a cooling water TDS concentration of 13,500 mg/L or less, the permittee shall resume the quarterly monitoring schedule.
- (2) After each TDS measurement, the permittee shall calculate the particulate emission rate, in pounds per hour, using the methodology outlined in section f)(1)b. below and AP-42 Section 13.4.2, dated January 1995.
- (3) The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted daily in an operations log. If visible emissions are observed, the permittee shall also note the following in an operations log:

- a. the location and 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 emissions event; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(3)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) **Reporting Requirements**

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements located in sections d)(1) through d)(3) above:
  - a. any total dissolved solids concentration greater than 13,500 mg/l and the corresponding particulate emissions rate calculated in pounds per hour;
  - b. all weeks during which any visible particulate emissions were observed from the stack(s) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the allowable stack opacity limitation identified above shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

PE shall not exceed 2.25 lbs/hr and 9.86 tpy

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation identified above shall be demonstrated by the following calculation:

$$E = W \times S \times D \times (60 \text{ min/hr}) \times (3.785412 \text{ liters/gal}) \times (1 \text{ lb}/453,592.37 \text{ mg})$$

Where:

E = Particulate emission rate, pounds per hour;

W = Maximum water flow rate, 6,000 gallons/minute;

S = Measured TDS level, milligrams per liter;

D = Cooling tower manufacturer's drift loss factor, 0.00005;

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

g) Miscellaneous Requirements

(1) None.

## 5. P902, DuraCube Production Line

### Operations, Property and/or Equipment Description:

This emissions unit consists of a flake breaker, conveyor, elevator, screener, storage bin and packaging operation to produce compacted salt for water softener regeneration. Process emissions are vented through two wet scrubbers to control particulates: P902AAPC for the nugget press and P902BAPC for the cooling system.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from all stacks serving this emissions unit, combined, shall not exceed 3.87 pounds per hour (lbs/hr).</p> <p>Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM<sub>10</sub>) emissions from all stacks serving this emissions unit, combined, shall not exceed 1.28 lbs/hr.</p> <p>Visible PE from any stack serving this emissions unit shall not exceed 5% opacity, as a 6-minute average.</p> <p>See b)(2)a. below.</p>

b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)(1) [The city of Akron is an area identified in Appendix A of OAC rule 3745-17-08.]	The emission limitation specified by this rule is less stringent than the limitation established pursuant to 40 CFR Part 60, Subpart OOO.
d.	OAC rule 3754-17-08(B)(3) [The city of Akron is an area identified in Appendix A of OAC rule 3745-17-08.]	See b)(2)b. below.
e.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the limitations established pursuant to OAC rule 3745-31-05(A)(3) and 40 CFR Part 60, Subpart OOO.
f.	40 CFR Part 60, Subpart OOO [40 CFR 60.670 - 60.676]	PE from each individual exhaust stack serving this emissions unit shall not exceed 0.05 grams per dry standard cubic meter (g/dscm) or 0.022 grains per dry standard cubic feet (gr/dscf). [40 CFR 60.672(a)]  Fugitive emissions from any building opening must not exceed 7% opacity, as a 30-minute average. [40 CFR 60.672(e)(1)]  See b)(2)c., b)(2)d. and c)(1) below.
g.	40 CFR Part 60, Subpart A [40 CFR 60.1 - 60.19]	General Provisions.

(2) Additional Terms and Conditions

- a. The hourly PE limitation specified by this rule is equivalent to the limitation established pursuant to 40 CFR Part 60, Subpart OOO.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirements:
  - i. The collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and

ii. The control equipment outlet particulate emission rate of not greater than 0.03 gr/dscf specified by this rule is less stringent than the limitation established pursuant to 40 CFR Part 60, Subpart OOO.

c. In accordance with 40 CFR 60.670(a), emissions unit P902 is a fixed nonmetallic mineral processing plant constructed after August 31, 1983 and subject to the emissions limitations and control measures specified in this section.

i. The permittee shall comply with the applicable requirements under 40 CFR Part 60, Subpart OOO, including the following sections:

60.670(d)	Replacement equipment
60.673(a) and (b)	Reconstruction

d. For stack emissions, the opacity limit and associated opacity testing requirements in Table 2 to Subpart OOO of Part 60 do not apply for affected facilities using wet scrubbers.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to a wet scrubber at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the pressure drop across the scrubber shall not increase or decrease by more than 30% of the average drop in inches of water determined during the most recent emissions test that demonstrated the emissions unit was in compliance.

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not decrease by more than 30% of the average scrubber liquid flow rate (gallons per minute) during the most recent emissions test that demonstrated the emissions unit was in compliance.

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in inches of water, gauge) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid flow rate on a daily basis.

(4) Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop and flow rate readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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

- (5) These range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or Local Air Agency. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative permit modification
- (6) The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the stack(s) and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted daily in an operations log. If visible emissions are observed, the permittee shall also note the following in an operations log:
  - a. the location and 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 emissions event; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(6)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (7) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart OOO, including the following sections:

60.674(a)	Monitoring equipment for wet scrubbers
60.676(c)	Records of wet scrubber pressure changes and liquid flow rate

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual PER the following information concerning the operations of the scrubbers during the 12-month reporting period for this emissions unit:
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
  - c. each incident of deviation described in e)(3)a. or e)(3)b. where a prompt investigation was not conducted;



- d. each incident of deviation described in e)(3)a. or e)(3)b. where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in e)(3)a. or e)(3)b. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements located in section d)(6) above:
- a. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all weeks during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (5) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart OOO, including the following sections:

60.676(a)	Replacement equipment notification
60.676(d) and (e)	Semiannual reports
60.676(f)	Performance test reports
60.676(i)	Initial startup notification

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the allowable stack opacity limitation identified above shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

Fugitive emissions from any building opening must not exceed 7% opacity, as a 30-minute average.

Applicable Compliance Method:

Compliance with the allowable opacity limitation for fugitive dust identified above shall be conducted in accordance with the applicable test methods and procedures under 40 CFR Part 60, Subpart OOO, including the following sections:

60.675(a)	Federal reference methods
60.675(c)(1) and (3)	Additional testing requirements
60.675(d)(2)	Initial compliance demonstration
60.675(e)	Alternative test procedures
60.675(g)	Advance notification

c. Emission Limitations:

Combined stack PE shall not exceed 3.87 lbs/hr

Combined stack PM-10 emissions shall not exceed 1.28 lbs/hr

Individual stack PE shall not exceed 0.05 g/dscm (0.22 gr/dscf)

Applicable Compliance Methods:

Compliance with the allowable particulate limitations identified above shall be determined based on the results of emissions testing conducted as specified in 40 CFR 60.675(b) and section f)(2) of this permit.

- (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 during each permit cycle with no test for the emissions unit occurring more than 10 years from the previous test date.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE and PM-10.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
    - i. for PE, Methods 1 - 5 of 40 CFR Part 60, Appendix A, and
    - ii. for PM-10, Method 201A of 40 CFR Part 51, Appendix M.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or Local Air Agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or Local Air Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or Local Air Agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or Local Air Agency.

g) Miscellaneous Requirements

- (1) None.

## 6. P905, Dairy Mill Operation

### Operations, Property and/or Equipment Description:

Three production lines (consisting of mixers, grinders, screeners and packaging units) used to mix sodium chloride with additives. Process emissions are vented through a wet scrubber to control particulates.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-07(B)(1) [The city of Akron is an area identified in Appendix A of OAC rule 3745-17-08.]	Visible PE from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
c.	OAC rule 3745-17-08(B)(3) [The city of Akron is an area identified in Appendix A of OAC rule 3745-17-08.]	See b)(2)a. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 40.3 pounds per hour (lbs/hr). [Appendix Table 1, Maximum process weight rate of 31.25 tons per hour.]

(2) Additional Terms and Conditions

- a. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirements:
  - i. The collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and
  - ii. The control equipment for this emissions units shall achieve an outlet particulate emission rate of not greater than 0.03 grains per dry standard cubic foot (gr/dscf) of exhaust gases or there shall be no visible PE (whichever is less stringent) from the exhaust stack(s) of this emissions unit.

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to a wet scrubber at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the stack(s) and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted daily in an operations log. If visible emissions are observed, the permittee shall also note the following in an operations log:
  - a. the location and 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 emissions event; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements located in section d)(1) above:
  - a. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all weeks during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the allowable stack opacity limitation identified above shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance with the allowable opacity limitation for fugitive dust identified above shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet particulate emission rate of not greater than 0.030 gr/dscf or there shall be no visible PE from the exhaust stack.

Applicable Compliance Method:

Compliance with the requirement for no visible PE from the exhaust stack, identified in this permit, shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet PE rate, compliance with the 0.030 gr/dscf from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

d. Emission Limitation:

PE shall not exceed 40.3 lbs/hr

Applicable Compliance Method:

If required, compliance with the hourly allowable PE limitation identified above shall be determined through stack testing performed in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.

## 7. P906, Pellet Operation

### Operations, Property and/or Equipment Description:

The pellet production operation consists of salt compactors, screeners, coolers, and packaging operation for each press. Process emissions are vented through two wet scrubbers to control particulates: P906AAPC for the pellet press operation and P906BAPC for the cooling system.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from all stacks serving this emissions unit, combined, shall not exceed 7.92 pounds per hour (lbs/hr).</p> <p>Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM-10) emissions from all stacks serving this emissions unit, combined, shall not exceed 2.61 lbs/hr.</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)(1) [The city of Akron is an area identified in Appendix A of OAC rule 3745-17-08.]	Visible PE from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
d.	OAC rule 3745-17-08(B)(3) [The city of Akron is an area identified in Appendix A of OAC rule 3745-17-08.]	See b)(2)b. below.
e.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3) and 40 CFR Part 60, Subpart OOO.
f.	40 CFR Part 60, Subpart OOO [40 CFR 60.670 - 60.676]	PE from each individual exhaust stack serving this emissions unit shall not exceed 0.05 grams per dry standard cubic meter (g/dscm) or 0.022 grains per dry standard cubic feet (gr/dscf). [40 CFR 60.672(a)]  See b)(2)c., b)(2)d. and c)(1) below.
g.	40 CFR Part 60, Subpart A [40 CFR 60.1 - 60.19]	General Provisions.

(2) Additional Terms and Conditions

- a. The hourly PE limitation specified by this rule is equivalent to the limitation established pursuant to 40 CFR Part 60, Subpart OOO.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirements:
  - i. The collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and
  - ii. The control equipment outlet particulate emission rate of not greater than 0.03 gr/dscf specified by this rule is less stringent than the limitation established pursuant to 40 CFR Part 60, Subpart OOO.
- c. In accordance with 40 CFR 60.670(a), emissions unit P906 is a fixed nonmetallic mineral processing plant constructed after August 31, 1983 and subject to the emissions limitations and control measures specified in this section.

- i. The permittee shall comply with the applicable requirements under 40 CFR Part 60, Subpart OOO, including the following sections:

60.670(d)	Replacement equipment
60.673(a) and (b)	Reconstruction

- d. For stack emissions, the opacity limit and associated opacity testing requirements in Table 2 to Subpart OOO of Part 60 do not apply for affected facilities using wet scrubbers.

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to a wet scrubber at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the pressure drop across the scrubber shall not increase or decrease by more than 30% of the average drop in inches of water determined during the most recent emissions test that demonstrated the emissions unit was in compliance.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not decrease by more than 30% of the average scrubber liquid flow rate (gallons per minute) during the most recent emissions test that demonstrated the emissions unit was in compliance.
- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in inches of water, gauge) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid flow rate on a daily basis.
- (4) Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop and flow rate readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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

- (5) These range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or Local Air Agency. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative permit modification
- (6) The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the stack(s) and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted daily in an operations log. If visible emissions are observed, the permittee shall also note the following in an operations log:
  - a. the location and 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 emissions event; and

- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(6)d. above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (7) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 60, Subpart OOO, including the following sections:

60.674(a)	Monitoring equipment for wet scrubbers
60.676(c)	Records of wet scrubber pressure changes and liquid flow rate

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate District Office or Local Air Agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual PER the following information concerning the operations of the scrubbers during the 12-month reporting period for this emissions unit:
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
  - c. each incident of deviation described in e)(3)a. or e)(3)b. where a prompt investigation was not conducted;
  - d. each incident of deviation described in e)(3)a. or e)(3)b. where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

- e. each incident of deviation described in e)(3)a. or e)(3)b. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements located in section d)(6) above:
  - a. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all weeks during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (5) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart OOO, including the following sections:

60.676(a)	Replacement equipment notification
60.676(d) and (e)	Semiannual reports
60.676(f)	Performance test reports
60.676(i)	Initial startup notification

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.  
  
Applicable Compliance Method:  
  
If required, compliance with the allowable stack opacity limitation identified above shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.
  - b. Emission Limitation:  
  
Visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance with the allowable opacity limitation for fugitive dust identified above shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitations:

Combined stack PE shall not exceed 7.92 lbs/hr

Combined stack PM-10 emissions shall not exceed 2.61 lbs/hr

Individual stack PE shall not exceed 0.05 g/dscm (0.22 gr/dscf)

Applicable Compliance Methods:

Compliance with the allowable particulate limitations identified above shall be determined based on the results of emissions testing conducted as specified in 40 CFR 60.675(b) and section f)(2) of this permit.

(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 during each permit cycle with no test for the emissions unit occurring more than 10 years from the previous test date.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates of PE and PM-10.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
  - i. for PE, Methods 1 - 5 of 40 CFR Part 60, Appendix A, and
  - ii. for PM-10, Method 201A of 40 CFR Part 51, Appendix M.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or Local Air Agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or Local Air Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or Local Air Agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or Local Air Agency.
- g) Miscellaneous Requirements
- (1) None.