



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

6/21/2013

Jeff Goldacker  
Autolite  
1600 N. Union Street  
Fostoria, OH 44830

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0374010117  
Permit Number: P0114963  
Permit Type: Administrative Modification  
County: Seneca

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Advertiser Tribune. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification  
Ohio EPA-NWDO; Michigan; Canada

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install  
Autolite

Issue Date: 6/21/2013  
Permit Number: P0114963  
Permit Type: Administrative Modification  
Permit Description: Administrative modification to decrease annual fuel usage rate and revise emission factors and emission limits based on 1/10/2013 stack test results.  
Facility ID: 0374010117  
Facility Location: Autolite  
1600 N. Union Street,  
Fostoria, OH 44830  
Facility Description: Other Motor Vehicle Electrical and Electronic Equipment Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



**Permit Strategy Write-Up**

Autolite

**Permit Number:** P0114963

**Facility ID:** 0374010117



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The facility manufactures and tests spark plugs for the auto industry. P074 consists of two test cells of gasoline-fired, dynamometer testing engines. The test cells are employed for spark plug and oxygen sensor quality assurance testing, as well as, R&D. This facility recently transferred ownership from Honeywell to Autolite.

3. Facility Emissions and Attainment Status:

Autolite is a major Title V facility. Potential emissions at the facility exceed PSD thresholds for CO. However, the facility currently has federally enforceable restrictions and limitations in place to reduce potential emissions of CO to avoid PSD applicability. This permit will further restrict the annual fuel usage rate for P074 to allow a higher CO emission factor based on 1/10/2013 stack testing results. The facility has demonstrated that actual CO emissions have never exceeded PSD thresholds.

4. Source Emissions:

Autolite performed stack testing of P074 on 1/10/2013 which resulted in an exceedance of the CO emission limit. The facility is requesting a modification to P074 to reflect a higher hourly CO emission limit and to further restrict the annual fuel usage rate to maintain the facility's current minor PSD designation.

5. Conclusion:

The federally enforceable restrictions requested by the facility to limit the potential to emit for P074 will prevent the facility's applicability of PSD requirements.

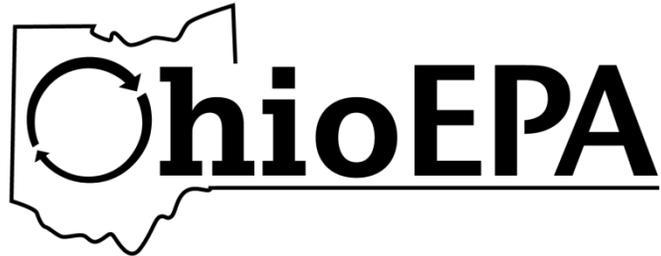
6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Rolling, 12-Month Period
CO	201.41
NOx	9.76
VOC	18.14
PM <sub>10</sub>	0.60
SO <sub>2</sub>	0.50





**DRAFT**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Autolite

Facility ID:	0374010117
Permit Number:	P0114963
Permit Type:	Administrative Modification
Issued:	6/21/2013
Effective:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Autolite

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**Draft Permit-to-Install**

Autolite

**Permit Number:** P0114963

**Facility ID:** 0374010117

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0374010117  
Facility Description: Spark plug testing engines.  
Application Number(s): A0047891  
Permit Number: P0114963  
Permit Description: Administrative modification to decrease annual fuel usage rate and revise emission factors and emission limits based on 1/10/2013 stack test results.  
Permit Type: Administrative Modification  
Permit Fee: \$100.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 6/21/2013  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Autolite  
1600 N. Union Street  
Fostoria, OH 44830

of a Permit-to-Install 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:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



**Draft Permit-to-Install**

Autolite

**Permit Number:** P0114963

**Facility ID:** 0374010117

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

**Permit Number:** P0114963

**Permit Description:** Administrative modification to decrease annual fuel usage rate and revise emission factors and emission limits based on 1/10/2013 stack test results.

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>P074</b>
Company Equipment ID:	Dyno Cells
Superseded Permit Number:	03-16079
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install**

Autolite

**Permit Number:** P0114963

**Facility ID:** 0374010117

**Effective Date:** To be entered upon final issuance

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



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

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



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

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## **10. Applicability**

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

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

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



**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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



**Draft Permit-to-Install**

Autolite

**Permit Number:** P0114963

**Facility ID:** 0374010117

**Effective Date:** To be entered upon final issuance

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



**Draft Permit-to-Install**

Autolite

**Permit Number:** P0114963

**Facility ID:** 0374010117

**Effective Date:** To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



**Draft Permit-to-Install**

Autolite

**Permit Number:** P0114963

**Facility ID:** 0374010117

**Effective Date:** To be entered upon final issuance

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



1. P074, Dyno Cells

Operations, Property and/or Equipment Description:

dynamometer spark plug testing engines.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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(D)	216.25 pounds carbon monoxide (CO)/hour; 201.41 tons CO per rolling, 12-month period  10.48 pounds nitrogen oxides (NOx)/hour; 9.76 tons NOx per rolling, 12-month period  19.48 pounds volatile organic compounds (VOC)/hour; 18.14 tons VOC per rolling, 12-month period  0.64 pound filterable particulate matter ≤ 10 microns in size (PM <sub>10</sub> )/hour; 0.60 ton filterable PM <sub>10</sub> per rolling, 12-month period  0.54 pound sulfur dioxide (SO <sub>2</sub> )/hour; 0.50 ton SO <sub>2</sub> per rolling, 12-month period  See b)(2)a. and c)(1).
b.	OAC rule 3745-17-11(B)(5)(a)	0.310 pound PE/mmBtu
c.	OAC rule 3745-17-07(A)	Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).



(2) Additional Terms and Conditions

a. This permit establishes federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid PSD applicability. The following federally enforceable emission limitations are based on the operational restriction contained in c)(1):

- i. 216.25 pounds CO/hour;
- ii. 10.48 pounds NO<sub>x</sub>/hour;
- iii. 19.48 pounds VOC/hour;
- iv. 0.64 pound filterable PM<sub>10</sub>/hour;
- v. 0.54 pound SO<sub>2</sub>/hour;
- vi. 201.41 tons CO per rolling, 12-month period;
- vii. 9.76 tons NO<sub>x</sub> per rolling, 12-month period;
- viii. 18.14 tons VOC per rolling, 12-month period;
- ix. 0.60 ton filterable PM<sub>10</sub> per rolling, 12-month period; and
- x. 0.50 ton SO<sub>2</sub> per rolling, 12-month period.

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [See b)(2)a.]:

a. The maximum, annual gasoline usage rate in this emissions unit shall not exceed 95,000 gallons per year, based upon a rolling, 12-month summation of the monthly fuel usage rates.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the fuel usage rate, upon issuance of this permit.

(2) The permittee shall only combust fuels in this emissions unit that are equivalent to, or more clean burning than, gasoline, as defined in OAC rule 3745-21-01.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the fuel usage, in gallons/month; and
- b. the rolling, 12-month summation of the fuel usage, in gallons.



- (2) For each day during which the permittee burns a fuel other than the fuel(s) identified in c)(2), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
  - (3) The permit to install for this emissions unit was evaluated based on information contained in the permit to install application. Prior to any physical change or change in the method of operation involving the dynamometer spark plug testing engines, the permittee shall conduct an evaluation to determine if the change would constitute a "modification" as defined in OAC rule 3745-31-01. If any physical change in, or change(s) in the method of operation is (are) defined as a modification, then the permittee shall obtain a final permit to install prior to performing such change. The permittee shall collect, record, and retain all evaluation information and the final determination when modification evaluations are performed.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).
  - (3) The permittee shall submit written reports that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
  - (4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than the fuel(s) identified in c)(2) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 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:  
216.25 pounds CO/hour



Application Compliance Method:

The hourly emission limitation represent the potential to emit of this emissions unit; therefore, hourly recordkeeping is not required. The potential to emit was determined in accordance with the following calculation:

4.24 pounds CO <sup>(1)</sup>	51.0 gallons <sup>(2)</sup>
gallon	hour

Where:

(1) Company supplied emission factor from stack testing performed 1/10/2013.

(2) Maximum hourly fuel usage rate, as supplied in permit application.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and Method 10 (CO) of 40 CFR Part 60, Appendix A.

b. Emission Limitations:

- 10.48 pounds NOx/hour
- 19.48 pounds VOC/hour
- 0.64 pound filterable PM<sub>10</sub>/hour
- 0.54 pound SO<sub>2</sub>/hour

Applicable Compliance Method:

The hourly emission limitations represent the potentials to emit of this emissions unit; therefore, hourly recordkeeping is not required. The potentials to emit were determined in accordance with the following calculation:

pound pollutant <sup>(1)</sup>	126,063 Btu <sup>(2)</sup>	51.0 gallons <sup>(3)</sup>	1 mmBtu <sup>(4)</sup>
mmBtu	gallon	hour	1,000,000 Btu

Where:

(1) Emission factors from U.S. EPA AP-42, Chapter 3.3 (10/1996):

- 1.63 pounds NOx/mmBtu;
- 3.03 pounds VOC/mmBtu;
- 0.10 pound filterable PM<sub>10</sub>/mmBtu; and
- 0.084 pound SO<sub>2</sub>/mmBtu.

(2) Heat content of fuel.

(3) Maximum hourly fuel usage rate, as supplied in permit application.

(4) Conversion factor.



If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and Method 7 (NOx), and/or Methods 18, 25, or 25A (VOC), and/or Method 6 (SO<sub>2</sub>) of 40 CFR Part 60, Appendix A, and/or 40 CFR Part 51, Appendix M, Methods 201/201A (filterable PM<sub>10</sub>).

c. Emission Limitations:

201.41 tons CO per rolling, 12-month period

Applicable Compliance Method:

The 12-month rolling emission limits were established based on the annual fuel usage restriction of 95,000 gallons per rolling, 12-month period. The annual emission restrictions can be calculated, as follows:

4.24 pound CO <sup>(1)</sup>	95,000 gallons <sup>(2)</sup>	1 ton <sup>(3)</sup>
gallon	year	2,000 pounds

Where:

- (1) Company supplied emission factors from stack testing performed 1/10/2013.
- (2) Restricted, annual fuel usage rate [see c)(1)].
- (3) Conversion factor.

Therefore, provided compliance is shown with the hourly limitations and the 12-month, rolling fuel usage restriction, compliance with the annual emission limitations shall also be demonstrated.

d. Emission Limitations:

9.76 tons NOx per rolling, 12-month period  
 18.14 tons VOC per rolling, 12-month period  
 0.60 ton filterable PM<sub>10</sub> per rolling, 12-month period  
 0.50 ton SO<sub>2</sub> per rolling, 12-month period

Applicable Compliance Method:

The 12-month rolling emission limits were established based on the annual fuel usage restriction of 95,000 gallons per rolling, 12-month period. The annual emission restrictions can be calculated, as follows:

lb pollutant <sup>(1)</sup>	126,063 Btu <sup>(2)</sup>	95,000 gals <sup>(3)</sup>	1 mmBtu <sup>(4)</sup>	1 ton <sup>(4)</sup>
mmBtu	gallon	year	1,000,000 Btu	2,000 lbs



Where:

(1) Emission factors from U.S. EPA AP-42, Chapter 3.3 (10/1996):

1.63 pounds NO<sub>x</sub>/mmBtu;  
3.03 pounds VOC/mmBtu;  
0.10 pound filterable PM<sub>10</sub>/mmBtu; and  
0.084 pound SO<sub>2</sub>/mmBtu.

(2) Heat content of fuel.

(3) Restricted, annual fuel usage rate [see c)(1)].

(4) Conversion factors.

Therefore, provided compliance is shown with the hourly limitations and the 12-month, rolling fuel usage restriction, compliance with the annual emission limitations shall also be demonstrated.

e. Emission Limitation:

0.310 pound PE/mmBtu

Applicable Compliance Method:

This emission limitation was established pursuant to OAC rule 3745-17-11(B). If required, compliance with the above emission limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

This emission limitation was established pursuant to OAC rule 3745-17-07(A). If required, compliance with the above emission limitation shall be determined in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.