State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
MIAMI COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 08-04110

DATE: 1/16/2003

Matsushita Display Devices Co of America
John Cavese
1400 West Market St
Troy, OH 45373

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,
Michael W. Ahern
Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **RAPCA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 1/16/2003**
Terms and Conditions **Effective Date: 1/16/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-04110

Application Number: 08-04110
APS Premise Number: 0855140417
Permit Fee: **$0**
Name of Facility: Matsushita Display Devices Co of America
Person to Contact: John Cavese
Address: 1400 West Market St
Troy, OH 45373

Location of proposed air contaminant source(s) [emissions unit(s)]:
1400 West Market St
Troy, Ohio

Description of proposed emissions unit(s):
administrative modification of P021 to remove reference to P002 and P003.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

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

2. Scheduled Maintenance/Malfunction Reporting

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

declared invalid.

6. General Requirements

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

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

6. 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.

7. 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).

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
CO	175.2

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P002 - A-108, CO Generating Natural Gas Fired Blackening Oven with Catalytic Incineration	OAC rule 3745-31-05 (A)(3)	240 lbs/day carbon monoxide (CO), 43.8 TPY CO
	OAC rule 3745-21-08 (B) and 3745-23-06(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-23-06(B), 3745-21-08(B), 3745-17-07(A), 3745-17-10(B) and 3745-17-08(A).
	OAC rule 3745-17-10(B)	See A.I.2.b 0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-06(A)	See A.I.2.c

2. Additional Terms and Conditions

2.a The application of a catalytic incinerator has been determined to be the best available control technique for the CO emissions from this process. [The CO control system is common for emissions units P002 and P003.]

2.b The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

2.c OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

II. Operational Restrictions

1. The average temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed), for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed) when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

   a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

3. The permittee shall on a quarterly basis monitor and record the CO combustion gas flow rate from the gas-blackening generator into the oven. Units shall be in cubic feet/hour.

4 The permittee shall install, operate and maintain equipment to continuously monitor and record the CO concentration by volume from the gas-blackening generator into the oven on an average hourly basis. Units shall be in pounds/cubic feet.

5. The monitoring and recording device shall be capable of accurately measuring the desired parameter and shall be properly operated and maintained in accordance with the manufacturer's recommendations.

The permittee shall maintain records of all data obtained by the continuous CO concentration monitoring system including, but not limited to, the average hourly CO concentration by volume, the results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

6. The permittee shall calculate the daily CO emission limitation in the following manner:

i. calculate CO emissions captured and controlled (1 - x)(y)(lbs CO/day)

ii. calculate fugitive CO emissions (1 - y)(lbs CO/day)

iii. sum i and ii, for the total controlled CO emission rate, in lbs CO/day

Where:

x = the measured destruction efficiency of the catalytic oxidizer from the most recent compliance test that demonstrated the emissions unit was in compliance

y = assume 50% capture efficiency from the oven until the actual capture efficiency is established during a compliance test that demonstrated the emissions unit was in compliance

lbs CO/day = (average hourly CO concentration, in lbs/cubic feet as measured by the monitor)(average hourly combustion gas flow rate, in cubic feet/hour as determined during testing and quarterly monitoring), and summing the average hourly rates for 24 hrs/day

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation, during which the average temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed) does not comply with the temperature limitations specified above.

2. All reports shall be submitted in accordance with General Term and Condition A.1.c.

3. The permittee shall submit deviation (excursion) reports that identifies each day during which the daily controlled CO emission rate exceeds 240 lbs/day. The notification shall include a copy of such record and shall be submitted in accordance with general term and condition A.1. within 30

days after the exceedance occurs.

4. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous CO monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the continuous CO monitoring system while the emissions unit was on line shall also be included in the quarterly report.

5. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) which specify the total annual CO emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

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

   a. Emission Limitation
   240 lbs/day carbon monoxide

   Applicable Compliance Method
   This emissions limitation was developed based upon the maximum oven CO generator rate of 420 lbs/day, 50% capture efficiency and 90% control device destruction efficiency.

   (420 lbs/day)(1 - 0.50)(1 - 0.90) + (420 lbs/day)(1 - 0.50) = 240 lbs/day CO

   Compliance with the 240 lbs/day limitation shall be based upon the records maintained in Sections A.III.3. and AIII.4. and the calculation method given in A.III.6.

   b. Emission Limitation
   43.8 TPY CO

   Applicable Compliance Method
   This emissions limitation was developed based upon the maximum daily emission rate of 240 pounds multiplied by 365 days/yr and divided by 2000 lbs/ton. Therefore, if compliance is demonstrated with the daily emissions limitation, then it is assumed that compliance will be demonstrated with the tons/year.

c. Emission Limitation:
0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb PE/mmBtu allowable limitation above by multiplying an emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr), and then dividing by the maximum heat input rate of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to OAC rule 3745-17-03(B)(9).

d. Emission Limitation-
Visible PE shall not exceed 20% opacity, as a six minute average, except as provided by rule.

Applicable Compliance Method-
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

2. Emissions Testing Requirement:

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO and the overall control efficiency limitation for CO and to establish the combustion gas flow rate, in cubic feet/hr.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for CO, Method 10 of 40 CFR Part 60 Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for CO are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the mass balance protocol approved on 10/25/95. The test methods and procedures selected shall be based on a consideration of the diversity of the pollutants present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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).

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.

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.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P002 - A-108, CO Generating Natural Gas Fired Blackening Oven with Catalytic Incineration	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P003 - B-108, CO Generating Natural Gas Fired Blackening Oven with Catalytic Incinerator	OAC rule 3745-31-05 (A)(3)	360 lbs/day CO, 65.7 TPY CO
	OAC rule 3745-21-08 (B) and 3745-23-06(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-23-06(B), 3745-21-08(B), 3745-17-07(A), 3745-17-10(B) and 3745-17-08(A). See A.I.2.b.
	OAC rule 3745-17-10(B)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-06(A)	See A.I.2.c.

2. Additional Terms and Conditions

2.a The application of a catalytic incinerator has been determined to be the best available control technique for the CO emissions from this process. [The CO control system is common for emissions units P002 and P003.]

2.b The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to

OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

2.c OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

II. Operational Restrictions

1. The average temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed), for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed) when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

   a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring

equipment, when the associated emissions unit was in operation.

3. The permittee shall on a quarterly basis monitor and record the combustion gas flow rate from the gas-blackening generator into the oven on an average hourly basis. Units shall be in cubic feet/hour.

4. The permittee shall install, operate and maintain equipment to continuously monitor and record the CO concentration by volume from the gas-blackening generator into the oven on an average hourly basis. Units shall be in pounds/cubic feet.

5. The monitoring and recording devices shall be capable of accurately measuring the desired parameters and shall be properly operated and maintained in accordance with the manufacturer's recommendations.

   The permittee shall maintain records of all data obtained by the continuous CO concentration monitoring system including, but not limited to, the average hourly CO concentration by volume, the results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

☐ The permittee shall calculate the daily CO emission limitation in the following manner:

   i. calculate CO emissions captured and controlled (1 - x)(y)(lbs CO/day)

   ii. calculate fugitive CO emissions (1 - y)(lbs CO/day)

   iii. sum i and ii, for the total controlled CO emission rate, in lbs CO/day

   Where:

   x = the measured destruction efficiency of the catalytic oxidizer from the most recent compliance test that demonstrated the emissions unit was in compliance

   y = assume 50% capture efficiency from the oven until the actual capture efficiency is established during a compliance test that demonstrated the emissions unit was in compliance

   lbs CO/day = (average hourly CO concentration, in lbs/cubic feet as measured by the monitor)(average hourly combustion gas flow rate, in cubic feet/hour as determined during testing and quarterly monitoring), and summing the average hourly rates for 24 hrs/day

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed) does not comply with the temperature limitations specified above.

2. All reports shall be submitted in accordance with General Term and Condition A.1.c.

3. The permittee shall submit deviation (excursion) reports that identifies each day during which the daily controlled CO emission rate exceeds 360 lbs/day. The notification shall include a copy of such record and shall be submitted in accordance with general term and condition A.1. within 30 days after the exceedance occurs.

4. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous CO monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the continuous CO monitoring system while the emissions unit was on line shall also be included in the quarterly report.

5. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) which specify the total annual CO emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

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

   a. Emission Limitation
   360 lbs/day carbon monoxide

   Applicable Compliance Method
   This emissions limitation was developed based upon the maximum oven CO generator rate of 648 lbs/day, 50% capture efficiency and 90% control device destruction efficiency.

   (648 lbs/day)(1 - 0.50)(1 - 0.90) + (648 lbs/day)(1 - 0.50) = 360 lbs/day CO

   Compliance with the 360 lbs/day limitation shall be based upon the records maintained in Sections A.III.3. and AIII.4. and the calculation method given in A.III.6.

   b. Emission Limitation

65.7 TPY CO

Applicable Compliance Method
This emissions limitation was developed based upon the maximum daily emission rate of 360 pounds multiplied by 365 days/yr and divided by 2000 lbs/ton. Therefore, if compliance is demonstrated with the daily emissions limitation, then it is assumed that compliance will be demonstrated with the tons/year.

c. Emission Limitation:
0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb PE/mmBtu allowable limitation above by multiplying an emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr), and then dividing by the maximum heat input rate of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to OAC rule 3745-17-03(B)(9).

d. Emission Limitation-
Visible PE shall not exceed 20% opacity, as a six minute average, except as provided by rule.

Applicable Compliance Method-
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

2. Emissions Testing Requirement:

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO and the overall control efficiency limitation for CO and to establish the combustion gas flow rate, in cubic feet/hr.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for CO, Method 10 of 40 CFR Part 60 Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for CO are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the mass balance protocol approved on 10/25/95. The test methods and procedures selected shall be based on a consideration of the diversity of the pollutants present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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).

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.

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.

VI. Miscellaneous Requirements

None

Emissions Unit ID: P003

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P003 - B-108, CO Generating Natural Gas Fired Blackening Oven with Catalytic Incinerator	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P021 - C-108, CO Generated Natural Gas Fired Blackening Oven with Catalytic Incinerator	OAC rule 3745-31-05 (A)(3)	360 lbs/day CO, 65.7 TPY CO
	OAC rule 3745-21-08 (B) and 3745-23-06(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-23-06(B), 3745-21-08(B), 3745-17-07(A), 3745-17-10(B) and 3745-17-08(A).
	OAC rule 3745-17-10(B)	See A.I.2.b. 0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-06(A)	See A.I.2.c.

2. Additional Terms and Conditions

2.a The application of a catalytic incinerator has been determined to be the best available control technique for the CO emissions from this process. [The CO control system is common for emissions units P002 and P003.]

2.b The permittee has satisfied the "best available control techniques and operating practices"

and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

2.c OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

II. Operational Restrictions

1. The average temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed), for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed) when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

   a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

3. The permittee shall on a quarterly basis monitor and record the combustion gas flow rate from the gas-blackening generator into the oven on an average hourly basis. Units shall be in cubic feet/hour.

4. The permittee shall install, operate and maintain equipment to continuously monitor and record the CO concentration by volume from the gas-blackening generator into the oven on an average hourly basis. Units shall be in pounds/cubic feet.

5. The monitoring and recording devices shall be capable of accurately measuring the desired parameters and shall be properly operated and maintained in accordance with the manufacturer's recommendations.

   The permittee shall maintain records of all data obtained by the continuous CO concentration monitoring system including, but not limited to, the average hourly CO flow rate, the results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

6. The permittee shall calculate the daily CO emission limitation in the following manner:

   i. calculate CO emissions captured and controlled (1 - x)(y)(lbs CO/day)

   ii. calculate fugitive CO emissions (1 - y)(lbs CO/day)

   iii. sum i and ii, for the total controlled CO emission rate, in lbs CO/day

   Where:

   x = the measured destruction efficiency of the catalytic oxidizer from the most recent compliance test that demonstrated the emissions unit was in compliance

   y = assume 50% capture efficiency from the oven until the actual capture efficiency is established during a compliance test that demonstrated the emissions unit was in compliance

   lbs CO/day = (average hourly CO concentration, in lbs/cubic feet as measured by the monitor)(average hourly combustion gas flow rate, in cubic feet/hour as determined during testing and quarterly monitoring), and summing the average hourly rates for 24 hrs/day

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases at the inlet to the catalytic incinerator (immediately before the catalyst bed) does not comply with the temperature limitations specified above.

2. All reports shall be submitted in accordance with General Term and Condition A.1.c.

3. The permittee shall submit deviation (excursion) reports that identifies each day during which the daily controlled CO emission rate exceeds 360 lbs/day. The notification shall include a copy of such record and shall be submitted in accordance with general term and condition A.1. within 30 days after the exceedance occurs.

4. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous CO monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the continuous CO monitoring system while the emissions unit was on line shall also be included in the quarterly report.

5. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) which specify the total annual CO emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

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

   a. Emission Limitation
   360 lbs/day carbon monoxide

   Applicable Compliance Method
   This emissions limitation was developed based upon the maximum oven CO generator rate of 648 lbs/day, 50% capture efficiency and 90% control device destruction efficiency.

   (648 lbs/day)(1 - 0.50)(1 - 0.90) + (648 lbs/day)(1 - 0.50) = 360 lbs/day CO

   Compliance with the 360 lbs/day limitation shall be based upon the records maintained in Sections A.III.3. and A.III.4. and the calculation method given in A.III.6.

   b. Emission Limitation
   65.7 TPY CO

   Applicable Compliance Method
   This emissions limitation was developed based upon the maximum daily emission rate of 360 pounds multiplied by 8760 hrs/yr and divided by 2000 lbs/ton. Therefore, if compliance is demonstrated with the hourly emissions limitation, then it is assumed that compliance will be demonstrated with the tons/year.

   c. Emission Limitation:

0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb PE/mmBtu allowable limitation above by multiplying an emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr), and then dividing by the maximum heat input rate of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to OAC rule 3745-17-03(B)(9).

d. Emission Limitation-
Visible PE shall not exceed 20% opacity, as a six minute average, except as provided by rule.

Applicable Compliance Method-
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

2. Emissions Testing Requirement:

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO and the overall control efficiency limitation for CO and to establish the combustion gas flow rate, in cubic feet/hr.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for CO, Method 10 of 40 CFR Part 60 Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for CO are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the mass balance protocol approved on 10/25/95. The test methods and procedures selected shall be based on a consideration of the diversity of the pollutants present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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).

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.

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.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P021 - C-108, CO Generated Natural Gas Fired Blackening Oven with Catalytic Incinerator	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None