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

7/25/2013

Certified Mail

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

Mr. Allen Wheeler
Jay Plastics-Broscho Fab. Prod. Div.
1595 W.Longview Avenue
Mansfield, OH 44906

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0370010128
Permit Number: P0115016
Permit Type: Initial Installation
County: Richland

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)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, Mansfield News-Journal. 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 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
122 South Front Street
Columbus, Ohio 43215

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 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

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

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

PUBLIC NOTICE
7/25/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Jay Plastics-Broscho Fab. Prod. Div.
1595 W. LONGVIEW AVENUE,
Mansfield, OH 44906
Richland County
FACILITY DESC.: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers
PERMIT #: P0115016
PERMIT TYPE: Initial Installation
PERMIT DESC: Installation of 9.361 MMBtu/hour, natural gas-fired generator. Permit includes federally enforceable restrictions and limitations to avoid Title V applicability.

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

1. Check all that apply:

   _X_ Synthetic Minor Determination
   Netting Determination

2. Source Description:

   This permit serves to establish a synthetic minor limitation for a natural gas-fired, reciprocating internal combustion engines. This permit is the result of a determination that resulted in combining two previously established facilities into one facility (Jay Plastics – Broshco Fabricating Products Division) for federal permitting purposes.

3. Facility Emissions and Attainment Status:

   This facility has requested synthetic minor restrictions because the facility's potential emissions of CO exceed 250 TPY and potential emissions of NOx exceed 100 TPY. Federally enforceable restrictions will lower potential emissions of CO and NOx to below Title V and PSD permitting thresholds. It should be noted that it was not necessary to address HAPs in this permit because potential HAP emissions at this facility were below MACT thresholds. Jay Plastics – Broshco Fabricating Products Division is located in Richland County and is classified as a minor facility for Title V and PSD purposes, taking into account the federally enforceable restrictions proposed in this permit. Richland County is designated attainment for all criteria pollutants.

4. Source Emissions:

   The company has requested a maximum annual operating restriction 4,200 hours, based upon a rolling, 12-month summation in order to reduce their annual CO and NOx emission rates to avoid the requirements of Title V and PSD.

   This restriction results in the following emission rates: 10.56 tons CO per rolling, 12-month period and 7.10 tons NOx per rolling, 12-month period.

5. Conclusion:

   In order to avoid PSD and Title V permitting requirements, federally enforceable restrictions and emission limits will be imposed on Jay Plastics – Broshco Fabricating Products Division for CO and NOx emissions to ensure the facility's potential CO and NOx emission rates remains below PSD and Title V significance thresholds.

6. Please provide additional notes or comments as necessary:

   None.

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

Pollutant	TPY
NOx	7.10 tons per rolling, 12-month period
CO	10.56 tons per rolling, 12-month period
VOC	0.99 ton per rolling, 12-month period
PM_{10}	0.19 ton per rolling, 12-month period
SO_2	0.01 ton per rolling, 12-month period

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Jay Plastics-Broscho Fab. Prod. Div.

Facility ID:	0370010128
Permit Number:	P0115016
Permit Type:	Initial Installation
Issued:	7/25/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Jay Plastics-Broscho Fab. Prod. Div.

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Authorization

Facility ID:	0370010128
Application Number(s):	A0048164
Permit Number:	P0115016
Permit Description:	Installation of 9.361 MMBtu/hour, natural gas-fired generator. Permit includes federally enforceable restrictions and limitations to avoid Title V applicability.
Permit Type:	Initial Installation
Permit Fee:	$400.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	7/25/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Jay Plastics-Broscho Fab. Prod. Div.
1595 W. LONGVIEW AVENUE
Mansfield, OH 44906

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0115016
Permit Description: Installation of 9.361 MMBtu/hour, natural gas-fired generator. Permit includes federally enforceable restrictions and limitations to avoid Title V applicability.

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

Emissions Unit ID:	**P006**
Company Equipment ID:	Generator #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

2. The permittee is advised that this facility is subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63 Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). Refer to 40 CFR 63.6590(c) for specific requirements in this case. The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements have not been delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District Office or local air agency.

C. Emissions Unit Terms and Conditions

1. P006, Generator #4

Operations, Property and/or Equipment Description:

9.361 mmBtu/hr (1531 HP) Natural Gas-Fired, 4-Stroke, Lean-Burn, Spark Ignition, Reciprocating Internal Combustion Engine with Electronic Control Module

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

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

a. b)(1)i.; d)(5) through d)(8); and e)(5)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	2.0 gram nitrogen oxides (NOx)/brake horsepower-hour (bhp-hour) & 14.18 tons NOx per rolling, 12-month period 4.0 grams carbon monoxide (CO)/bhp-hour & 28.35 tons CO per rolling, 12-month period 1.0 gram volatile organic compounds (VOC)/bhp-hour & 7.10 ton VOC per rolling, 12-month period 9.99×10^{-03} pound particulate matter ≤ 10 microns in size (PM_{10})/mmBtu& 0.19 ton PM_{10} per rolling 12-month period 5.88×10^{-04} pound sulfur dioxide (SO_2)/mmBtu& 0.01 ton SO_2 per rolling

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		12-month period See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.
c.	OAC rule 3745-18-06	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
d.	OAC rule 3745-17-11(B)(5)(b)	0.062 pound particulate emissions (PE) per mmBtu
e.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-110-03(F)	This emissions unit is exempt from the requirements of OAC rule 3745-110-03 pursuant to OAC rule 3745-110-03(J)(3).
g.	40 CFR Part 60 (NSPS), Subpart JJJJ	Uncertified, non-emergency, stationary, spark ignition, lean burn, internal combustion engine greater than 500 HP manufactured after July 1, 2007 See b)(2)c., b)(2)d., c)(3), d)(4), e)(4); and f)(2)(h).
h.	40 CFR 60. 1-19 (40 CFR 60.4246)	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 60. 1-19 apply.
i.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(5) through d)(8) and e)(5).

(2) Additional Terms and Conditions

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

i. 2.0 gram NOx/bhp-hour;

ii. 4.0 grams CO/bhp-hour;

iii. 1.0 gram VOC/bhp-hour;

iv. 9.99×10^{-03} pound PM_{10}/mmBtu;

v. 5.88×10^{-04} pound SO_2/mmBtu;

vi. 14.18 tons NOx per rolling, 12-month period;

vii. 28.35 tons CO per rolling, 12-month period;

viii. 7.10 tons VOC per rolling, 12-month period;

ix. 0.19 ton PM_{10} per rolling, 12-month period; and

x. 0.01 ton SO_2 per rolling, 12-month period.

b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the emission limitations established pursuant to OAC rule 3745-31-05(D) and the requirements of OAC rules 3745-17-11(B)(5)(b) and 3745-17-07(A) and 40 CFR Part 60, Subpart JJJJ.

c. The emission standards for NOx, CO, and VOC specified by this rule are equivalent to the emission limitations established pursuant to OAC rule 3745-31-05(D). As outlined in 40 CFR Part 60.4233(e), the stationary combustion engine is subject to the emissions standards contained in Table 1 for a "Non-Emergency, Spark Ignition, Lean Burn" engine fueled by natural gas and manufactured prior to July 1, 2010.

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

60.4233(e)	Emission standards for stationary spark ignition internal combustion engines equal to or greater than 100 HP.
Table 1 to 40 CFR Part 60, Subpart JJJJ	Non-Emergency SI Lean Burn Natural Gas Engines manufactured prior to 7/1/2010: 2.0 g NOx/HP-hr; 4.0 g CO/HP-hr; and 1.0 g VOC/HP-hr
60.4243(b)(2)(ii)	Keep a maintenance plan and records of conducted maintenance. Maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions. Conduct an initial performance test. Conduct subsequent performance

	testing every 8,760 hours or 3 years, whichever comes first.

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. This emissions unit shall be operated with appropriate air/fuel ratios and shall be equipped with electronic control module (ECM) for fuel metering.

b. The maximum annual operating hours shall not exceed 4,200 hours, based upon a rolling, 12-month summation of the operating hours.

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 production rate, upon issuance of this permit.

(2) The permittee shall burn only natural gas in this emissions unit.

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4243(g)	Operation and maintenance of air-to-fuel ratio controllers.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day this emissions unit is operated, the permittee shall record the total hours of operation.

(2) The permittee shall maintain monthly records of the following information:

a. the total monthly operating hours (summation of the daily hours of operation for each calendar month); and

b. the rolling, 12-month summation of the monthly operating hours.

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

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

60.4245(a)(1)	Maintain records of all notifications and documents supporting any notification required in this subpart.

60.4245(a)(2)	Maintain records of maintenance conducted on the engine.
60.4245(a)(4)	Maintain documentation that the engine meets the emission standards of this subpart.

(5) The application for this/these emissions unit(s) was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Formaldehyde

TLV (mg/m^3): 0.27

Maximum Hourly Emission Rate (lbs/hr): 0.49

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 3.98

MAGLC ($\mu g/m^3$): 6.47

The permittee has demonstrated that emissions of air toxic contaminants from this emissions unit is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

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:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 4,200 hours of operation per rolling, 12-month period;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4245(c)	Submit an initial notification as required in §60.7(a)(1), which includes the following: 1. name and address of the owner or operator; 2. the address of the affected source; 3. engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement; 4. emission control equipment; and 5. fuel used.

(5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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

2.0 gram NOx/bhp-hour

4.0 grams CO/bhp-hour

1.0 gram VOC/bhp-hour

Applicable Compliance Method

The permittee shall demonstrate compliance with the allowable NOx, CO, and VOC emission limitations above based on the results of emission testing conducted in accordance with section f)(2) of this permit.

The above emission limitations were established in accordance with the emission standards established pursuant to 40 CFR Part 60, Subpart JJJJ. The emission limitations are reflective of emission control techniques from the use of appropriate air/fuel ratios and electronic control module (ECM) for fuel metering.

b. Emission Limitations

9.99×10^{-03} pound PM_{10}/mmBtu

5.88×10^{-04} pound SO_2/mmBtu

Applicable Compliance Method

The emission limitationsabove were established in accordance with the emission factors from AP-42, Chapter 3.2: Natural Gas-fired Reciprocating Engines (7/2000).

If required, the permittee shall demonstrate compliance with the PM_{10}emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and in 40 CFR Part 51, Appendix M, Methods 201/201A and 202.

If required, the permittee shall demonstrate compliance with the SO_2emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.

c. Emission Limitations:

14.18 tons NOx per rolling, 12-month period

28.35 tons CO per rolling, 12-month period

7.10 ton VOC per rolling, 12-month period

0.19 ton PM_{10} per rolling, 12-month period

0.01 ton SO_2 per rolling, 12-month period

Applicable Compliance Method

The above emission limitations were established based on 4,200 hours of operation per 12-month period and can be calculated, as follows:

For pollutants with emission factors specified in grams/bhp-hour:

gram pollutant (1)	1531 bhp-hr(2)	4200 hours (3)	1 pound (4)	1 ton (4)
bhp-hr		12-months	453.59 gram	2000 pounds

Where:

(1) Pollutant-specific emission factor, as supplied by permittee.

(2) Maximum capacity of the generator.

(3) Restricted hours of operation.

(4) Conversion rates.

For pollutants with emission factors specified in pounds/mmBtu:

pound pollutant (1)	9.361 mmBtu(2)	4200 hours (3)	1 ton (4)
mmBtu	hour	12-months	2000 pounds

Where:

(1) Emission factor from AP-42 Chapter 3.2 (7/00).

(2) Maximum capacity of the generator.

(3) Restricted hours of operation.

(4) Conversion rate.

Therefore, provided compliance is shown with the gram/bhp-hour and pound/mmBtu limitations and the 12-month, rolling hours of operation restriction, compliance with the annual emission limitations shall be demonstrated.

d. Emission Limitation

0.062 pound PE/mmBtu

Applicable Compliance Method

If required, compliance with the emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(10).

[This emission limitation was established in accordance with OAC rule 3745-17-11(B)(5)(b).]

e. Emission Limitation

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

Applicable Compliance Method

If required, compliance with the visible emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

[This emission limitation was established in accordance with OAC rule 3745-17-07(A).]

(2) Emission Testing Requirements

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 no later than October 19, 2013 to fulfill the initial performance requirement of §60.4243(b)(2)(ii). The testing time frame specified may be amended or waived for cause upon prior request of, and written approval of, the appropriate Ohio EPA District Office or local air agency. Future testing requirements shall be conducted in accordance with 40 CFR Part 60, Subpart JJJJ [§60.4243(b)(2)(ii)].

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for: NOx, CO, and VOC.

c. Methods 1-4 and the following additional test methods from 40 CFR, Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rates:

Pollutant	Test Method
NOx	Method 7
CO	Method 10
VOC	Methods 18, 25, or 25A, as appropriate

Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable

emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 60 days following completion of the test(s) pursuant to §60.4245(d).

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

60.4244(a) through (g)	Performance test procedures.
60.4245(d)	Submit a copy of each performance test conducted pursuant to this subpart within 60 days after the test has been completed.

g) Miscellaneous Requirements

(1) None.