



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

9/26/2013

Allen Wheeler  
Jay Plastics, Inc.  
150 East Longview Avenue  
Mansfield, OH 44903-4206

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0370010058  
Permit Number: P0115083  
Permit Type: Administrative Modification  
County: Richland

Certified Mail

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

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

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

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

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

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

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

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)3528461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-NWDO; Canada



## Response to Comments

Facility ID:	0370010058
Facility Name:	Jay Plastics, Inc.
Facility Description:	Miscellaneous plastic parts coating operations.
Facility Address:	150 East Longview Avenue Mansfield, OH 44903-4206 Richland County
Permit:	P0115083, Permit-To-Install - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Mansfield News-Journal on 08/18/2013. The comment period ended on 09/17/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

### 1. Topic: None

**a. Comment 1:** For the Emissions Unit Terms and Conditions for P004 - 2.b.1.a., the PM10 annual tonnage should be 0.68 lb/hr and 0.43 ton/yr. OAC, 3745-17-11(B)(5)(b) limits particulate emissions to 0.062 lb per MMBtu actual heat input for large stationary RICE (>600 bhp). This would put BAT and the permit limitation for PM10 at 0.68 lb/hr and 0.43 ton/yr, based on the operating hours limitation of 1250 hrs/yr.

**Response:** The PM10 emissions from P004 will need to follow the more stringent AP-42, Table 3.2-2 emission factor for BAT of  $9.5 \times 10^{-3}$  lb PM10/mmBtu as opposed to the 17-11(B)(5)(b) 0.062 lb per MMBtu limit found in the SIP. The Ap-42 limits are more stringent and would be considered BAT.

**b. Comment 2:** For the Emissions Unit Terms and Conditions for P005 - 3.b.1.a., the PM10 annual tonnage should be 0.43 lb/hr and 0.40 ton/yr. OAC, 3745-17-11(B)(5)(b) limits particulate emissions to 0.062 lb per MMBtu actual heat input for large stationary RICE (>600 bhp). This would put BAT and the permit limitation for PM10 at 0.43 lb/hr and 0.40 ton/yr, based on the operating hours limitation of 1850 hrs/yr.

**Response:** The PM10 emissions from P005 will need to follow the more stringent AP-42, Table 3.2-2 emission factor for BAT of  $9.5 \times 10^{-3}$  lb PM10/mmBtu as opposed to the 17-11(B)(5)(b)



0.062 lb per MMBtu limit found in the SIP. The Ap-42 limits are more stringent and would be considered BAT.

**c. Comment 3:** Table 2d states that “for each non-emergency, non-black start 4SRB stationary RICE >500 HP that are not remote stationary RICE and that operate more than 24 hours per calendar year (12) you must meet the following requirement, except during periods of startup: Install NSCR to reduce HAP emissions from the stationary RICE.” This EU currently does not have NSCR and will need to install a system to meet these requirements. There are no table 2b requirements. There are no numerical 2d or 2b limits.

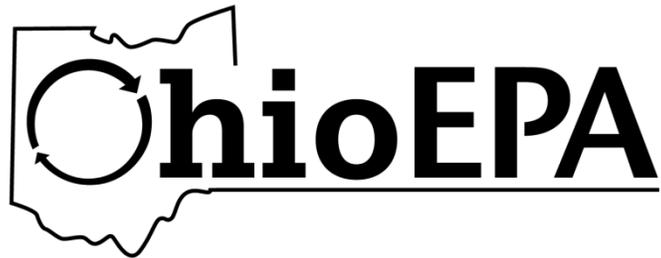
**Response:** Ohio EPA agrees, Table 2b limits were placed in permit in error and will correct. Under Table 2d, P004 will be required to install an NSCR to reduce HAP emissions.

**d. Comment:** Table 5 states that “for each non-emergency, non-black start 4SRB stationary RICE >500 HP that are not remote stationary RICE and that operate more than 24 hours per calendar year (14) complying with the requirement to Install NSCR that you have demonstrated initial compliance if... i. you have conducted an initial compliance demonstration as specified in § 63.6630(e) to show that the average reduction of emissions of CO is 75 percent or more, the average CO concentration is less than or equal to 270 ppmvd at 15 percent O<sub>2</sub>, or the average reduction of emissions of THC is 30 percent or more; and ii. you have installed a CPMS to continuously monitor catalyst inlet temperature according to the requirements in § 63.6625(b), or you have installed equipment to automatically shut down the engine if the catalyst inlet temperature exceeds 1250 °F.” Therefore, the facility would need to demonstrate initial compliance for EU P004 through the options given.

**Response:** Terms and Conditions on an initial compliance demonstration found in Table 5 of 40 CFR Part 63 Subpart ZZZZ were included in the permit.

**e. Comment:** Table 6 states that “for each non-emergency, non-black start 4SRB stationary RICE >500 HP that are not remote stationary RICE and that operate more than 24 hours per calendar year (15) complying with the requirement to Install NSCR that you must demonstrated compliance by... i. conducting annual compliance demonstrations as specified in § 63.6640(c) to show that the average reduction of emissions of CO is 75 percent or more, the average CO concentration is less than or equal to 270 ppmvd at 15 percent O<sub>2</sub>, or the average reduction of emissions of THC is 30 percent or more; and either and ii. collecting the catalyst inlet temperature data according to § 63.6625(b), reducing these data to 4-hour rolling averages; and maintaining the 4-hour rolling averages within the limitation of greater than or equal to 750 °F and less than or equal to 1250 °F for the catalyst inlet temperature; or iii. immediately shutting down the engine if the catalyst inlet temperature exceeds 1250 °F. Therefore, the facility would need to conduct an annual compliance demonstration through the options selected from Table 5.

**Response:** Terms and conditions on a continuous compliance demonstration found in Table 6 of 40 CFR Part 63 Subpart ZZZZ were included in the permit.



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Jay Plastics, Inc.**

Facility ID:	0370010058
Permit Number:	P0115083
Permit Type:	Administrative Modification
Issued:	9/26/2013
Effective:	9/26/2013





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Jay Plastics, Inc.

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. Federally Enforceable Standard Terms and Conditions .....	4
2. Severability Clause .....	4
3. General Requirements .....	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting .....	6
6. Compliance Requirements .....	6
7. Best Available Technology .....	7
8. Air Pollution Nuisance .....	7
9. Reporting Requirements .....	7
10. Applicability .....	8
11. Construction of New Sources(s) and Authorization to Install .....	8
12. Permit-To-Operate Application .....	9
13. Construction Compliance Certification .....	9
14. Public Disclosure .....	9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations .....	10
16. Fees.....	10
17. Permit Transfers .....	10
18. Risk Management Plans .....	10
19. Title IV Provisions .....	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions .....	13
1. P004, Generator #1 .....	14
2. P005, Generator #2 .....	31





**Final Permit-to-Install**  
Jay Plastics, Inc.  
**Permit Number:** P0115083  
**Facility ID:** 0370010058  
**Effective Date:** 9/26/2013

## Authorization

Facility ID: 0370010058  
Facility Description: Miscellaneous plastic parts coating operations.  
Application Number(s): A0048202  
Permit Number: P0115083  
Permit Description: Administrative Modification to address incorrect engine specifications, emissions limitations and rule applicability.  
Permit Type: Administrative Modification  
Permit Fee: \$600.00  
Issue Date: 9/26/2013  
Effective Date: 9/26/2013

This document constitutes issuance to:

Jay Plastics, Inc.  
150 East Longview Avenue  
Mansfield, OH 44903-4206

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally  
Director



**Final Permit-to-Install**  
Jay Plastics, Inc.  
**Permit Number:** P0115083  
**Facility ID:** 0370010058  
**Effective Date:** 9/26/2013

## Authorization (continued)

Permit Number: P0115083  
Permit Description: Administrative Modification to address incorrect engine specifications, emissions limitations and rule applicability.

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

<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Generator #1
Superseded Permit Number:	P0104081
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Generator #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Jay Plastics, Inc.  
**Permit Number:** P0115083  
**Facility ID:** 0370010058  
**Effective Date:** 9/26/2013

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



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

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

## **2. Severability Clause**

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

## **3. General Requirements**

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



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

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

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



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

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

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

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

## **6. Compliance Requirements**

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



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

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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



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

## **10. Applicability**

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

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

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

## **13. Construction Compliance Certification**

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

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

## **14. Public Disclosure**

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



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

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

**16. Fees**

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

**17. Permit Transfers**

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

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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



**Final Permit-to-Install**  
Jay Plastics, Inc.  
**Permit Number:** P0115083  
**Facility ID:** 0370010058  
**Effective Date:** 9/26/2013

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



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
  
2. 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.
  - a) None.



**Final Permit-to-Install**  
Jay Plastics, Inc.  
**Permit Number:** P0115083  
**Facility ID:** 0370010058  
**Effective Date:** 9/26/2013

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



**1. P004, Generator #1**

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

10.98 mmBtu/hr, 1391HP, 1038 KW Natural Gas 4 Stroke Rich Burn generator.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Particulate matter less than or equal to ten microns in diameter (PM10) shall not exceed 0.10 lb/hr and 0.065 ton per rolling, 12 month period.  Volatile organic compound (VOC) emissions shall not exceed 0.92 lb/hr and 0.57 ton per rolling, 12 month period  Nitrogen oxide (NOx) emissions shall not exceed 39.92 lbs/hr and 24.95 tons per rolling, 12 month period  Carbon monoxide (CO) emissions shall not exceed 27.54 lbs/hr and 17.21 tons per rolling, 12 month period.  Sulfur dioxide (SO2) emissions shall not exceed 0.01 lb/hr and 0.004 ton per rolling, 12 month period.  See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(5)(b)	See b)(2)c.
d.	OAC rule 3745-18-06	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR, Part 63, Subpart ZZZZ (40 CFR 63.6580 to 63.6675)	The existing, natural gas, stationary 4SRB spark ignition (SI) reciprocating internal combustion engine (RICE), located at an area source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than October 19, 2013.
g.	40 CFR, Part 63, Subpart A	Per § 63.6665, Table 8 to 40 CFR Part 63, Subpart ZZZZ shows which parts of the General Provisions in §63.1 through 63.15 are applicable to Subpart ZZZZ.
h.	40 CFR, Part 60, Subpart JJJJ	This emissions unit is exempt from the requirements of this rule because it was manufactured before July 1, 2007.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(D) and are based on the operational restrictions contained in c)(1):
  - i. 0.10 lbs PM10/hr; 0.065 tons PM10 per rolling, 12 month period;
  - ii. 0.92 lb VOC/hr; 0.57 tons VOC per rolling, 12 month period;
  - iii. 39.92 lbsNOx/hr; 24.95 tons NOxper rolling, 12 month period;
  - iv. 27.54 lbs CO/hr; 17.21 tons CO per rolling, 12 month period;
  - v. 0.01 lb SO2/hr; 0.004 tons SO2 per rolling, 12 month period.
- b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with OAC rule 3745-31-05(D), OAC rule 3745-17-07(A) and 40 CFR, Part 63, Subpart ZZZZ.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- d. The emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
- e. The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 63, Subpart ZZZZ:
  - i. Per § 63.6635(b), except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as



applicable, calibration checks and required zero and span adjustments), you must monitor continuously at all times that the stationary RICE is operating.

- ii. Per § 63.6635(c), the permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. You must, however, use all the valid data collected during all other periods.
- iii. Per § 63.6640(a), the permittee must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.
- iv. Per § 63.6640(b), the permittee must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.
- v. Per § 63.6640(e), the permittee must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you.
- vi. Per § 63.6603(a), if you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 2b to this subpart that apply to you. Table 2d requires an NSCR to reduce HAP emissions from the stationary RICE.
- vii. Per § 63.6630(a), the permittee must demonstrate initial compliance with the emission limitations, operating limitations, and other requirements that apply to you according to Table 5 of this subpart. Table 5 states that if complying with the requirement to install an NSCR, compliance can be demonstrated through the following:
  - (a) Conducting an initial compliance demonstration as specified in 63.6630(e) to show that the average reduction of emissions of CO is 75 percent or more, the average CO concentration is less than or equal to 270 ppmvd at 15 percent O<sub>2</sub>, or the average reduction of emissions of THC is 30 percent or more;



- (b) Installing a CPMS to continuously monitor catalyst inlet temperature according to the requirements in 63.6625(b), or install equipment to automatically shut down the engine if the catalyst inlet temperature exceeds 1250 degrees Fahrenheit.
- viii. Per 63.6640(c) and Table 6, the permittee must demonstrate continuous compliance by:
  - (a) conducting an annual compliance demonstration to show that the average reduction of emissions of CO is 75 percent or more, the average CO concentration is less than or equal to 270 ppmvd at 15 percent O2, or the average reduction of emissions of THC is 30 percent or more, and;
  - (b) Collecting the catalyst inlet temperature data according to 63.6625(b), reducing these data to 4-hour rolling averages; and maintaining the 4-hour rolling averages within the limitation of greater than or equal to 750 degrees Fahrenheit and less than or equal to 1250 degrees Fahrenheit for the catalyst inlet temperature;
  - (c) Immediately shutting down the engine if the catalyst inlet temperature exceeds 1250 degrees Fahrenheit.
- c) Operational Restrictions

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

- a. The maximum annual operating hours for this emissions unit shall not exceed 1,250 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	104
1-2	208
1-3	312
1-4	416
1-5	520
1-6	624



<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1-7	728
1-8	832
1-9	932
1-10	1040
1-11	1144
1-12	1250

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 63, Subpart ZZZZ:
  - a. Per § 63.6605(b), the permittee must at all times operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
  - b. Per § 63.6625(h), if you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.
- (3) The permittee shall burn only natural gas in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain monthly records of the following information:
    - a. The operating hours for each month; and



- b. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, monthly summation of the operating hours.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

- (2) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type of fuel burned in this emissions unit.
- (3) The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 63, Subpart ZZZZ:
  - a. Per §63.6655(a), if you must comply with the emission and operating limitations, you must keep the records described in the following:
    - i. A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).
    - ii. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
    - iii. Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).
    - iv. Records of all required maintenance performed on the air pollution control and monitoring equipment.
    - v. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
  - b. Per §63.6655(b), for each CEMS or CPMS, you must keep the following records:
    - i. Records described in §63.10(b)(2)(vi) through (xi).
    - ii. Previous (i.e., superseded) versions of the performance evaluation plan as required in §63.8(d)(3).
    - iii. Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in §63.8(f)(6)(i), if applicable.
  - c. Per §63.6655(d), you must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.



- d. Per § 63.6625(a), if you elect to install a CEMS as specified in Table 5 of this subpart, you must install, operate, and maintain a CEMS to monitor CO and either oxygen or CO<sub>2</sub> at both the inlet and the outlet of the control device according to the following requirements:
- i. Each CEMS must be installed, operated, and maintained according to the applicable performance specifications of 40 CFR part 60, appendix B.
  - ii. You must conduct an initial performance evaluation and an annual relative accuracy test audit (RATA) of each CEMS according to the requirements in §63.8 and according to the applicable performance specifications of 40 CFR part 60, appendix B as well as daily and periodic data quality checks in accordance with 40 CFR part 60, appendix F, procedure 1.
  - iii. As specified in §63.8(c)(4)(ii), each CEMS must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. You must have at least two data points, with each representing a different 15-minute period, to have a valid hour of data.
  - iv. The CEMS data must be reduced as specified in §63.8(g)(2) and recorded in parts per million or parts per billion (as appropriate for the applicable limitation) at 15 percent oxygen or the equivalent CO<sub>2</sub> concentration.
- e. Per § 63.6625(b), if you are required to install a continuous parameter monitoring system (CPMS) as specified in Table 5 of this subpart, you must install, operate, and maintain each CPMS according to the requirements in the following paragraphs:
- i. The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four successive cycles of operation to have a valid hour of data.
  - ii. Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation at all times that the unit is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
  - iii. For purposes of calculating data averages, you must not use data recorded during monitoring malfunctions, associated repairs, out of control periods, or required quality assurance or control activities. You must use all the data collected during all other periods in assessing compliance. Any 15-minute period for which the monitoring system is out-



of-control and data are not available for the required calculations constitutes a deviation from the monitoring requirements.

- iv. Determine the 3-hour block average of all recorded readings, except as provided in paragraph d)(6)c. above.
- v. Record the results of each inspection, calibration, and validation check.
- vi. You must develop a site-specific monitoring plan that addresses the following:
  - (a) Installation of the CPMS sampling probe or other interface at the appropriate location to obtain representative measurements;
  - (b) Performance and equipment specifications for the sample interface, parametric signal analyzer, and the data collection and reduction systems;
  - (c) Performance evaluation procedures and acceptance criteria ( e.g., calibrations);
  - (d) Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(c)(1), (c)(3), and (c)(4)(ii);
  - (e) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d); and
  - (f) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §63.10(c), (e)(1), and (e)(2)(i).
- vii. You must conduct a performance evaluation of each CPMS in accordance with your site-specific monitoring plan.
- viii. You must operate and maintain the CPMS in continuous operation according to the site-specific monitoring plan.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation;

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be



submitted to the Director (the appropriate Ohio EPA District Office) within 30 days after the deviation occurs.

- (3) The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 63, Subpart ZZZZ:
- a. Per 63.6645(a), the permittee must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) (see General Provisions below) that apply to you by the dates specified.
  - b. Per 63.6645(g), if you are required to conduct a performance test, you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1).
  - c. Per 63.6645(h), if you are required to conduct a performance test or other initial compliance demonstration as specified in Tables 4 and 5 to this subpart, you must submit a Notification of Compliance Status according to §63.9(h)(2)(ii).
    - i. Per 63.6645(h)(1), for each initial compliance demonstration required in Table 5 to this subpart that does not include a performance test, you must submit the Notification of Compliance Status before the close of business on the 30th day following the completion of the initial compliance demonstration.
    - ii. Per 63.6645(h)(2), for each initial compliance demonstration required in Table 5 to this subpart that includes a performance test conducted according to the requirements in Table 3 to this subpart, you must submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th day following the completion of the performance test according to §63.10(d)(2).
  - d. Per §63.6650(a), you must submit each report in Table 7 of this subpart that applies to you.
  - e. Per §63.6650(b), unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date in Table 7 of this subpart and according to the following requirements:
    - i. For semiannual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.6595.
    - ii. For semiannual Compliance reports, the first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.6595.



- iii. For semiannual Compliance reports, each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- iv. For semiannual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- v. For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of this section.
- vi. For annual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.6595 and ending on December 31.
- vii. For annual Compliance reports, the first Compliance report must be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date that is specified for your affected source in §63.6595.
- viii. For annual Compliance reports, each subsequent Compliance report must cover the annual reporting period from January 1 through December 31.
- ix. For annual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than January 31.
- f. Per §63.6650(c), the Compliance report must contain the following information:
  - i. Company name and address.
  - ii. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
  - iii. Date of report and beginning and ending dates of the reporting period.
  - iv. If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction.



- v. If there are no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period.
- vi. If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
- g. Per §63.6650(d), for each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report must contain the information in e)(2)f.i. through e)(2)f.iv. (above) and the following information:
  - i. The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
  - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- h. Per §63.6650(e), for each deviation from an emission or operating limitation occurring for a stationary RICE where you are using a CMS to comply with the emission and operating limitations in this subpart, you must include information in e)(2)f.i. through e)(2)f.iv. (above) and the following information:
  - i. The date and time that each malfunction started and stopped.
  - ii. The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.
  - iii. The date, time, and duration that each CMS was out-of-control, including the information in §63.8(c)(8).
  - iv. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period.
  - v. A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.
  - vi. A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.
  - vii. A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total



operating time of the stationary RICE at which the CMS downtime occurred during that reporting period.

- viii. An identification of each parameter and pollutant (CO or formaldehyde) that was monitored at the stationary RICE.
  - ix. A brief description of the stationary RICE.
  - x. A brief description of the CMS.
  - xi. The date of the latest CMS certification or audit.
  - xii. A description of any changes in CMS, processes, or controls since the last reporting period.
- i. Per §63.6650(f), each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.

f) Testing Requirements

- (1) The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 63, Subpart ZZZZ:
- a. The emission testing shall be conducted to fulfill the initial performance requirements of 63.6595(a)(1) and 63.6612(a). 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 63, Subpart ZZZZ [§63.7(a)(2)].
  - b. Per 63.6612(a), the permittee must conduct any initial performance test or other initial compliance demonstration according to Tables 4 and 5 to this subpart that apply to you within 180 days after the compliance date that is specified for your stationary RICE in 63.6595 and according to the provisions in 63.7(a)(2).
  - c. An owner or operator is not required to conduct an initial performance test on a unit for which a performance test has been previously conducted, but the test must meet all of the following conditions:



- i. The test must have been conducted using the same methods specified in this subpart, and these methods must have been followed correctly.
  - ii. The test must not be older than 2 years.
  - iii. The test must be reviewed and accepted by the Administrator.
  - iv. Either no process or equipment changes must have been made since the test was performed, or the owner or operator must be able to demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process or equipment changes.
- d. Per §63.6620(a), you must conduct each performance test in Tables 3 and 4 of this subpart that applies to you.
- e. Per §63.6620(b), each performance test must be conducted according to the requirements that this subpart specifies in Table 4 to this subpart. If you own or operate a non-operational stationary RICE that is subject to performance testing, you do not need to start up the engine solely to conduct the performance test. Owners and operators of a non-operational engine can conduct the performance test when the engine is started up again.
- f. Per §63.6620(f), if you comply with the emission limitation to reduce CO and you are not using an oxidation catalyst, if you comply with the emission limitation to reduce formaldehyde and you are not using NSCR, or if you comply with the emission limitation to limit the concentration of formaldehyde in the stationary RICE exhaust and you are not using an oxidation catalyst or NSCR, you must petition the Administrator for operating limitations to be established during the initial performance test and continuously monitored thereafter; or for approval of no operating limitations. You must not conduct the initial performance test until after the petition has been approved by the Administrator.
- g. Per §63.6620(g), if you petition the Administrator for approval of operating limitations, your petition must include the following information:
- i. Identification of the specific parameters you propose to use as operating limitations;
  - ii. A discussion of the relationship between these parameters and HAP emissions, identifying how HAP emissions change with changes in these parameters, and how limitations on these parameters will serve to limit HAP emissions;
  - iii. A discussion of how you will establish the upper and/or lower values for these parameters which will establish the limits on these parameters in the operating limitations;



- iv. A discussion identifying the methods you will use to measure and the instruments you will use to monitor these parameters, as well as the relative accuracy and precision of these methods and instruments; and
  - v. A discussion identifying the frequency and methods for recalibrating the instruments you will use for monitoring these parameters.
- h. Per §63.6620(h), if you petition the Administrator for approval of no operating limitations, your petition must include the information described in paragraphs (h)(1) through (7) of this section.
- i. Identification of the parameters associated with operation of the stationary RICE and any emission control device which could change intentionally ( e.g., operator adjustment, automatic controller adjustment, etc.) or unintentionally ( e.g., wear and tear, error, etc.) on a routine basis or over time;
  - ii. A discussion of the relationship, if any, between changes in the parameters and changes in HAP emissions;
  - iii. For the parameters which could change in such a way as to increase HAP emissions, a discussion of whether establishing limitations on the parameters would serve to limit HAP emissions;
  - iv. For the parameters which could change in such a way as to increase HAP emissions, a discussion of how you could establish upper and/or lower values for the parameters which would establish limits on the parameters in operating limitations;
  - v. For the parameters, a discussion identifying the methods you could use to measure them and the instruments you could use to monitor them, as well as the relative accuracy and precision of the methods and instruments;
  - vi. For the parameters, a discussion identifying the frequency and methods for recalibrating the instruments you could use to monitor them; and
  - vii. A discussion of why, from your point of view, it is infeasible or unreasonable to adopt the parameters as operating limitations.
- i. Per §63.6620(i), the engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report: the engine model number, the engine manufacturer, the year of purchase, the manufacturer's site-rated brake horsepower, the ambient temperature, pressure, and humidity during the performance test, and all assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained. If measurement devices such as



flow meters, kilowatt meters, beta analyzers, stain gauges, etc. are used, the model number of the measurement device, and an estimate of its accurate in percentage of true value must be provided.

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

a. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 0.10lb/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying an emission factor of  $9.50 \times 10^{-3}$  lb PM<sub>10</sub>/mmBtu (AP-42, Table 3.2-2) by a maximum capacity of 10.98 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR, Part 60; Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

b. Emission Limitation:

VOC emissions shall not exceed 0.92 lbs/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying a manufacturer's supplied emission factor of 6.61 lb x 10<sup>-4</sup> lbs VOC/hp-hr by a maximum horsepower rating of 1,391 horsepower. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 39.92 lbs/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying a manufacturer's supplied emission factor of  $2.87 \times 10^{-2}$  lbsNO<sub>x</sub>/hp-hr by a maximum horsepower rating of 1,391 horsepower. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

CO emissions shall not exceed 27.54 lbs/hr



Applicable Compliance Method:

The hourly emission limitation was established by multiplying a manufacturer's supplied emission factor of  $1.98 \times 10^{-2}$  lbs CO/hp-hr by a maximum horsepower rating of 1,391 horsepower. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

e. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 0.005 lbs/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying an emission factor of  $5.88 \times 10^{-4}$  lb SO<sub>2</sub>/mmBtu (AP-42, Table 3.2-2) by a maximum capacity of 9.08 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

f. Emission Limitations:

- i. 0.065 tonPM10 per rolling, 12 month period;
- ii. 0.57 tonVOC per rolling, 12 month period;
- iii. 24.95 tons NOx per rolling, 12 month period;
- iv. 17.21 tons CO per rolling, 12 month period; and
- v. 0.004 ton SO<sub>2</sub> per rolling, 12 month period.

Applicable Compliance Method

The above emission limitations were established based on 1,250 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 <sup>(1)</sup>	1391 bhp-hr <sup>(2)</sup>	1250 hours <sup>(3)</sup>	1 pound <sup>(4)</sup>	1 ton <sup>(4)</sup>
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 <sup>(1)</sup>	10.98 mmBtu <sup>(2)</sup>	1250 hours <sup>(3)</sup>	1 ton <sup>(4)</sup>
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.

g. Emission Limitation:

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

Applicable Compliance Method:

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

h. Emission Limitation

0.062 pound PE/mmBtu

Applicable Compliance Method

This emission limitation was established in accordance with OAC rule 3745-17-11(B)(5)(b). If required, compliance with the emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(10).

g) **Miscellaneous Requirements**

- (1) None.



**2. P005, Generator #2**

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

4 Stage Rich Burn, 7.01 mmBtu/hr, 917 HP, 684 KW generator.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Particulate matter less than or equal to ten microns in diameter (PM10) shall not exceed 0.067 lb/hr and 0.062ton per rolling, 12 month period  Sulfur dioxide (SO2) emissions shall not exceed 0.004 lb/hr and 0.004 ton per rolling, 12 month period  Nitrogen dioxide (NOx) emissions shall not exceed 6.06 lbsNOx/hr and 5.61 tons per rolling, 12 month period  Volatile organic compound (VOC) emissions shall not exceed 2.02 lbs VOC/hr and 1.87 tons per rolling, 12 month period  Carbon monoxide (CO) emissions shall not exceed 8.09 lbs CO/hr and 7.48 tons per rolling, 12 month period  See b)(2)a., and c)(1)
	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05 (A)(3), as effective 12/01/06	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(5)(b)	See b)(2)e.
e.	OAC rule 3745-18-06	See b)(2)f.
f.	40 CFR, Part 60, Subpart JJJJ	Uncertified, non-emergency, stationary, spark ignition, rich burn, internal combustion engine greater than 500 HP reconstructed after June 12, 2006  3.0 grams nitrogen oxides (NOx)/brake horsepower-hour (bhp-hour)  4.0 grams/bhp-hr for carbon monoxide (CO)  1.0 gram/bhp-hr for volatile organic compounds (VOC)
	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.
g.	40 CFR, Part 63, Subpart ZZZZ	Pursuant to 40 CFR Part 63.6590(c), this emissions unit must meet the requirements of 40 CFR, Part 60, Subpart JJJJ to be in compliance with 40 CFR, Part 63, Subpart ZZZZ. No other requirements under 40 CFR, Part 63, Subpart ZZZZ apply to this emissions unit.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(D) and are based on the operational restrictions contained in c)(1):
- i. 0.067 lbs PM10/hr; 0.062 tons PM10 per rolling, 12 month period;
  - ii. 0.004 lbs SO2/hr; 0.004 tons SO2 per rolling, 12 month period.
  - iii. 2.02 lbs VOC/hr; 1.87 tons VOC per rolling, 12 month period;
  - iv. 6.06 lbsNOx/hr; 5.61 tons NOx per rolling, 12 month period; and



- v. 8.09 lbs CO/hr; 7.48 tons CO per rolling, 12 month period.
- b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01, have been determined to be compliance with OAC rule 3745-31-05(D), OAC rule 3745-17-07(A) and the requirements of 40 CFR, Part 60, Subpart JJJJ.
- c. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.
- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM10, NOx, CO, SO2 and VOC emissions from this air contaminant source since the calculated annual emission rate for PM10, NOx, CO, SO2 and VOC emissions is less than 10 tons/yr taking into account the federally enforceable restrictions under OAC rule 3745-31-05(D).

- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- f. The emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
- g. The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 60, Subpart JJJJ:
  - i. Per 60.4233(f)(4), owners and operators of non-emergency engines and emergency engines greater than or equal to 130 HP must meet a nitrogen oxides (NOX ) emission standard of 3.0 grams per HP-hour (g/HP-hr), a CO emission standard of 4.0 g/HP-hr (5.0 g/HP-hr for non-emergency engines less than 100 HP), and a volatile organic compounds (VOC) emission standard of 1.0 g/HP-hr.
  - ii. Per 60.4243(a)(2)(iii), owners or operators of a stationary SI internal combustion engine greater than 500 HP must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test within 1 year of engine



startup and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

c) Operational Restrictions

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

a. The maximum annual operating hours shall not exceed 1,850 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	154
1-2	308
1-3	462
1-4	616
1-5	770
1-6	924
1-7	1078
1-8	1232
1-9	1386
1-10	1540
1-11	1694
1-12	1850

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.



- (2) The permittee shall burn only natural gas in this emissions unit.
  - (3) The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 60, Subpart JJJJ:
    - a. Per 60.4243(g), air-to-fuel ratio controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.
    - b. Per 60.4243(i)(2), Conduct a performance test to demonstrate initial compliance with the emission standards according to the requirements specified in § 60.4244. The test must be conducted within 60 days after the engine commences operation after the modification or reconstruction.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain monthly records of the following information:
    - a. The operating hours for each month; and
    - b. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, monthly summation of the operating hours.
- Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.
- (2) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type of fuel burned in this emissions unit.
  - (3) The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 60, Subpart JJJJ:
    - a. Per 60.4245(a), Owners and operators of all stationary SI ICE must keep records of the following information:
      - i. All notifications submitted to comply with this subpart and all documentation supporting any notification.
      - ii. Maintenance conducted on the engine.
      - iii. If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.
      - iv. If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §



60.4243(a)(2), documentation that the engine meets the emission standards.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation;

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office) within 30 days after the deviation occurs.
- (3) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 60, Subpart JJJJ:
  - a. Per 60.4245(c), Owners and operators of a stationary SI ICE greater than or equal to 500 HP that have not been certified by an engine manufacturer to meet the emission standards in § 60.4231 must submit an initial notification as required in § 60.7(a)(1).
  - b. Per 60.4245(d), Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.

f) Testing Requirements

- (1) The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 60, Subpart JJJJ:
  - a. Per §60.4244(a), each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in § 60.8 and under the specific conditions that are specified by Table 2 to this subpart.
- (2) 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  
3.0 gram NOx/bhp-hour



4.0 grams CO/bhp-hour

1.0 gram VOC/bhp-hour

Applicable Compliance Method:

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.

The permittee shall demonstrate compliance with the NO<sub>x</sub>, CO, and VOC emission limitations based on the results of emission testing required in section f)(3).

b. Emission Limitations:

PM<sub>10</sub> emissions shall not exceed 0.067 lb/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying an emission factor of  $9.5 \times 10^{-3}$  lb PM<sub>10</sub>/mmBtu (AP-42, Table 3.2-2), a maximum capacity of 7.01 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

c. Emission Limitations:

SO<sub>2</sub> emissions shall not exceed 0.004 lb/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying an emission factor of  $5.88 \times 10^{-4}$  lb SO<sub>2</sub>/mmBtu (AP-42, Table 3.2-2), a maximum capacity of 7.01 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

a. Emission Limitation:

VOC emissions shall not exceed 2.02 lbs/hr

Applicable Compliance Method:

The hourly emission limitation was established by dividing the 40 CFR, Part, 60 Subpart JJJJ standard of 1.0 gram per brake horsepower-hour (g/bhp-hr) by 453.59 grams and then multiplying by the maximum horsepower rating of 917 horsepower. If required, the permittee shall demonstrate compliance by testing in



accordance with Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 6.06 lbs/hr

Applicable Compliance Method:

The hourly emission limitation was established by dividing the 40 CFR, Part, 60 Subpart JJJJ standard of 3.0 gram per brake horsepower-hour (g/bhp-hr) by 453.59 grams and then multiplying by the maximum horsepower rating of 917 horsepower. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

CO emissions shall not exceed 8.09 lbs/hr

Applicable Compliance Method:

The hourly emission limitation was established by dividing the 40 CFR, Part, 60 Subpart JJJJ standard of 4.0 gram per brake horsepower-hour (g/bhp-hr) by 453.59 grams and then multiplying by the maximum horsepower rating of 917 horsepower. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

d. Emission Limitations:

1.87 tons VOC per rolling, 12 month period;

5.61 tons NO<sub>x</sub> per rolling, 12 month period;

7.48 tons CO per rolling, 12 month period;

0.062 ton PM<sub>10</sub> per rolling, 12 month period; and

0.004 ton SO<sub>2</sub> per rolling, 12 month period.

Applicable Compliance Method:

The above emission limitations were established based on 1,850 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 <sup>(1)</sup>	917 bhp-hr <sup>(2)</sup>	1850 hours <sup>(3)</sup>	1 pound <sup>(4)</sup>	1 ton <sup>(4)</sup>
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 <sup>(1)</sup>	7.01 mmBtu <sup>(2)</sup>	1850 hours <sup>(3)</sup>	1 ton <sup>(4)</sup>
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.

e. Emission Limitation:

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

Applicable Compliance Method:

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

- (3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted no later than October 19, 2013 to fulfill the initial performance requirement of §60.4243(b)(2)(iii). 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)(iii)].



- 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:

<u>Pollutant</u>	<u>Test Method</u>
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).



**Final Permit-to-Install**  
Jay Plastics, Inc.  
**Permit Number:** P0115083  
**Facility ID:** 0370010058  
**Effective Date:** 9/26/2013

g) Miscellaneous Requirements

(1) None.