☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **08-04742**

A. Source Description

Delphi Energy and Chassis Systems-Kettering Operations is a manufacturer of automobile parts and components. PTI 08-04742 specifies federally enforceable SM emissions limitations to reduce the facility's potential HAP emissions so as to exempt them from Subpart DDDDD.

B. Facility Emissions and Attainment Status

Delphi Energy and Chassis System-Kettering Operations is a Title V facility classified as major for Nitrogen Oxides, Carbon Monoxide, Sulfur Dioxide, and Volatile Organic Compounds. The facility is located in Montgomery County which is currently non-attainment for all ozone and PM2.5 emissions. Delphi has the following type of non-insignificant emissions units: coal fired boilers, gas fired boilers, paint coating lines, hard chrome plating lines, electrodesposition paint line, and oil storage tanks. This PTI is to specify a SM limitation for two coal boilers and for two surface coating operations to reduce the facility's potential HAP emissions, and thus would exempt the facility from Subpart DDDDD. One of the coating operations, K020, is an existing unit installed prior to 1974 and therefore did not have a PTI, and is included in this PTI.

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters MACT, 40 CFR Part 63, Subpart DDDDD was promulgated September 13, 2004. The facility is defined as an existing source with a compliance date of September 13, 2007. Without this SM limitation in this PTI, the permittee would be subject to the MACT requirements. The requirements of this SM will limit the facility's HAPS emissions allowing it to avoid the MACT requirements. The SM limitations to avoid the MACT will be included in the facility's Title V renewal. The current Title V expires 12/27/07.

C. Source Emissions

The highest potential emissions of a single HAP for the facility is HCl, all of which originates from the burning of coal in B003 and B004. Delphi voluntarily requested federally enforceable limitations limiting the combined HCL emissions from these boilers, By restricting the coal throughput of the boilers, to less that MACT applicability threshold of 9.9 ton/yr for a single HAP. Originally, B004 was permitted to burn #2 fuel oil. Delphi no longer uses fuel oil. As a result, emissions for all pollutants from these boiler will be less than earlier permitted limitations.

To insure the facility's total HAP emissions are maintained below major source levels for MACT applicability, Delphi voluntarily requested federally enforceable restrictions on the coating material usages for coating operations K020 and K029.

D. Conclusion

This is a synthetic minor PTI containing federally enforceable requirements to ensure the HAP emissions for the facility are maintained below MACT thresholds at 9.9 TPY for a single HAP compound and 24.9 TPY for combined HAP compounds. Monthly monitoring, record keeping and quarterly deviation reporting will be required to monitor compliance. Therefore, through federally enforceable terms and conditions and record keeping requirements, Delphi-Kettering will not trigger MACT requirements.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
MONTGOMERY COUNTY

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

Application No: 08-04742
Fac ID: 0857080148

DATE: 8/24/2006

Delphi Energy and Chassis Systems-Ket Op
JoAnn Rau
2000 Forrer Blvd
Dayton, OH 454011042

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$2400** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA RAPCA Miami Valley Regional Planning Commission KY IN

MONTGOMERY COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **08-04742** FOR AN AIR CONTAMINANT SOURCE FOR
Delphi Energy and Chassis Systems-Ket Op

On 8/24/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Delphi Energy and Chassis Systems-Ket Op**, located at **2000 Forrer Blvd, Kettering**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04742:

Synthetic minor limiting HAPS to avoid boiler MACT and misc. metal parts coating MACT, replacing 08-057, 04-144, 08-1802 (for K020) and adding a previous exiting unit.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: To be entered upon final issuance**
Terms and Conditions	**Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04742

Application Number:	08-04742
Facility ID:	0857080148
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Delphi Energy and Chassis Systems-Ket Op
Person to Contact:	JoAnn Rau
Address:	2000 Forrer Blvd Dayton, OH 454011042

Location of proposed air contaminant source(s) [emissions unit(s)]:
2000 Forrer Blvd
Kettering, Ohio

Description of proposed emissions unit(s):
Synthetic minor limiting HAPS to avoid boiler MACT and misc. metal parts coating MACT, replacing 08-057, 04-144, 08-1802 (for K020) and adding a previous exiting unit.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

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

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

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

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

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

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (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 B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency 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.

iv. If this permit is for an emissions unit located at a Title V facility, then 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.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain,

the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

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

6. General Requirements

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

7. Fees

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

permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

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

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

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

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

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

the Ohio EPA. Progress reports shall contain the following:

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

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

10. Permit-To-Operate Application

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

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

11. Best Available Technology

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

12. Air Pollution Nuisance

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

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in

this permit.

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

1. Compliance Requirements

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.

2. 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 appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)

3. Permit Transfers

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

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing 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 modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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.

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

C. Permit-To-Install Summary of Allowable Emissions

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

Delphi Energy and Chassis Systems-Ket Op **Facility ID: 0857080148**
PTI Application: 08-04742
Issued: To be entered upon final issuance

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

Pollutant	Tons Per Year
Single HAP	9.9
Combined HAPs	24.9
SO2	192.0
PE	6.8
NOx	67.8
OC	13.1

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) Industrial, Commercial, and Institutional Boilers and Process Heaters MACT, 40 CFR Part 63, Subpart DDDDD promulgated September 13, 2004. The facility is defined as existing source with a compliance date of September 13, 2007. This PTI will be issued as a synthetic minor containing federally enforceable requirements emissions to ensure the HAP emissions for the facility are maintained below MACT thresholds allowing the facility to avoid the MACT requirements.

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

None

Emissions Unit ID: B003

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements
B003 - 150 mmBTU/hr coal spreader stoker boiler; Boiler No. 3, with cyclone and baghouse *Modification	OAC rules 3745-18-63(Q)(2)
	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)
	OAC rule 3745-17-10(C)(1)
	OAC rules 3745-21-08(B) and 3745-23-06(B)
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid MACT)

Applicable Emissions Limitations/Control Measures	
The sulfur dioxide (SO2) emissions from this emissions unit shall not exceed 1.2 lbs/mmBTU of actual heat input.	emissions unit shall not exceed 67.8 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 67.8 tons/yr
The particulate emissions (PE) from this emissions unit shall not exceed 0.14 lb/mmBTU actual heat input for this emission unit.	The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-63(Q)(2), 3745-17-07(A), 3745-21-08(B) and 3745-23-06(B).
The maximum annual PE from this emissions unit shall not exceed 6.8 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 6.8 tons/yr.	The visible PE from this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
The maximum annual SO2 emissions from this emissions unit shall not exceed 192.0 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 192.0 tons/yr.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The nitrogen oxides (NOx) emissions from this emissions unit shall not exceed 90 lbs/hour.	See Section A.I.2.a.
The maximum annual NOx emissions from this	See Section A.I.2.b and A.II.3.

2. Additional Terms and Conditions

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

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.b The emissions of HAPs, as identified in Section 112(b) of Title III of the Clean Air Act, from the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on rolling, 12-month summations.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 12 inches of water while the emissions unit is in operation.

2. The quality of coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emissions limits in Section A.I.

3. The maximum rolling, 12-month coal throughput for emissions units B003 and B004, combined is limited by the following equation:

12

□ □ [□U_n□□C_n/100)(36/35){1- (R_n) x (K/100)}] ≤ 9.90 tons/yr, based on a

rolling
M=1 n 12-month summation

where,

M = the increment emissions of the rolling 12-month period;

n = individual lot of coal* utilized during the period;

U_n = the throughput of coal for each individual lot n, in tons;

C_n = chlorine content in weight % for each individual coal lot n

(36/35) = molecular weight of chloride is 35 lb/lb-mole and hydrochloric acid is 36 lb/lb-mole

R_n = a value of 1 (one) when fuel additive is employed for HCl control for coal throughput U_n, R_n equals a value of 0 (zero) when no fuel additive is employed for coal throughput U_n

K = % control efficiency for fuel additive as determined during the most recent performance test (see A.V.3).

*An individual lot of coal, n, is defined as an amount of coal utilized which is consistent in chlorine content and the application or non-application of fuel additive (e.g., lot 1 = 0.1% chlorine & fuel additive applied, lot 2 = 0.1% chlorine & no fuel additive applied, lot 3 = 0.2% chlorine & fuel additive applied, etc)

The equation above assumes 100% of the chlorine contained in the coal is converted to HCl.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the coal throughput for emissions units B003 and B004, combined is limited by the following:

Month	☐ [☐U_n☐☐C_n/100)(36/35){1- (R_n) x (K/100)}] n is less than or equal to
1	1.98
1-2	3.96
1-3	5.94
1-4	7.92
1-12	9.9

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coal throughput restriction shall be based upon a rolling, 12-month summation.

4. When fuel additive is employed to control HCl emissions, the application rate, in pounds of fuel additive per ton of coal processed, shall be maintained at a level of not less than the rate established during the most recent performance test (see A.V.3).

5. The maximum annual coal throughput for emissions units B003 and B004, combined, shall not exceed 12,322 tons/year.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

   Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

   Each monthly composite sample of coal shall be analyzed for chlorine content (percent). The analytical methods for chlorine content shall be the most recent version of SW-846-9250 or ASTM E776-87 or equivalent.

3. The permittee shall maintain monthly records of the following information:

   a. total quantity of coal received;

   b. results of the analyses for ash content, sulfur content, heat content, and chlorine content for the composite sample; and

   c. the calculated sulfur dioxide emission rate (in lb/mmBTU) for the composite sample.

4. The permittee shall maintain records of the following information each month for emissions units B003 and B004, combined:

   a. the company identification of each lot of coal (as defined in A.II.3) utilized;

   b. documentation as to whether or not fuel additive was applied for each lot of coal utilized;

   c. the chlorine content, in weight percent, for each lot of coal utilized;

   d. the quantity, in tons, of each lot of coal utilized;

   e. the calculated HCl emissions from each lot of coal, in tons, using the following equation:

      $E_n = [\square U_n \square \square C_n/100)(36/35)\{1- (R_n) \times (K/100)\}]$

      where,

      E_n = HCl emissions from individual coal lots utilized;

      All other variables are the same as described in A.II.3;

   f. the total HCl emission rate of all coal lots utilized, in tons/month, calculated as follows:

      $E_M = E_1 + E_2 + E_3 + ... + E_n$

      where:

      E_M = Monthly HCl emissions, in tons/month; and
      E_n = HCl emissions from each individual lot of coal utilized (A.III.4.e); and

   g. the rolling, 12-month summation of the HCl emission rate calculated as follows:

$E_T = E_{M1} + E_{M2} + E_{M3} + ... + E_{M12}$

where:

E_T = Annual HCl emissions (tons) as summed from the previous 12 months of monthly HCl emissions for emissions units B003 and B004, combined; and
E_M = Monthly HCl emissions (tons/month) for emissions units B003 and B004.

5. For each lot of coal that fuel additive is employed, the permittee shall maintain the following records for emissions units B003 and B004:

   a. the type and amount of fuel additive applied, in pounds;

   b. the amount of coal utilized, in tons; and

   c. the resulting feed rate of the fuel additive, in pounds/ton of coal utilized.

6. The permittee shall collect and record the following information each month for the entire facility for the purpose of determining the HAP* emissions:

   a. the total (after control) individual HAP emissions for each HAP, in tons;

   b. the total combined HAPs emissions (all combustion related HAPs emissions from this emissions unit plus HAPs emissions from other emissions units located at the facility), in tons;

   c. the rolling, 12-month summation of individual HAP emissions for each HAP, in tons; and

   d. the rolling, 12-month summation of total combined HAPs emissions, in tons.

   The total (after control) HAPs emission rates shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

   *A listing of the Hazardous Air Pollutants can be found n Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

7. The permittee shall operate and maintain the continuous opacity monitoring system to

continuously monitor and record the opacity of the particulate emissions from this emissions unit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of data obtained by the continuous opacity monitoring system including, but not limited to:

a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

The permittee shall maintain on-site documentation from the U.S. EPA or the Ohio EPA verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware,

8. The permittee shall develop and maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the

continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The permittee shall notify the Director (the RAPCA) in writing of any record that shows a deviation of the allowable sulfur dioxide limitation (lb/mmBTU), as shown by the calculated sulfur dioxide emission rates from Section A.III.3 above. The notification shall include a copy of such record and shall be sent to the Director (the RAPCA) within 45 days after the deviation occurs.

   Compliance with the sulfur dioxide emissions limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate using a weighted average from the analyses of the composite samples.

3. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the maximum allowable cumulative coal throughput specified in Section A.II.3 for emissions units B003 and B004, combined.

4. The permittee shall submit quarterly deviation (excursion) reports that summarize the following:

   a. which identify all exceedances of the rolling, 12-month coal throughput restriction for emissions units B003 and B004, combined specified in Section A.II.3;

   b. all exceedances of the facility rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 and 24.9 tons, respectively.

   These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

5. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all lots of coal utilized in this emission unit when fuel additive was applied and the fuel additive feed rate in pounds of fuel additive per tons of coal utilized was not maintained at or above the level as specified in Section A.II.4.

6. The permittee shall submit annual reports that summarize the actual annual individual

HAP emissions from the facility, and the actual annual combined HAPs emissions from the facility. The report shall be submitted by January 31 of each year and shall cover for the previous calendar year.

7. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:

   a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. If there are no exceedances during the calendar quarter, the permittee shall submit a statement to that effect.

   b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

      (i) the facility name and address;

      (ii) the manufacturer and model number of the continuous opacity monitor;

      (iii) the location of the continuous opacity monitor;

      (iv) the exceedance report as detailed in (a) above;

      (v) the total operating time (hours) of the emissions unit;

      (vi) the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;

      (vii) the date, time, and duration of any/each malfunction* of the continuous opacity monitoring system, emissions unit, and/or control equipment;

      (viii) the date, time, and duration of any downtime* of the continuous opacity

monitoring system and/or control equipment while the emissions unit was in operation; and

(ix) the reason (if known) and the corrective actions taken (if any) for each event in (b)(7) and (8).

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

* each downtime and malfunction event shall be reported regardless if there is an exceedance of the opacity limit

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation-
   The SO2 emissions from this emission unit shall not exceed 1.2 pounds per mmBTU of actual heat input.

   Applicable Compliance Method-
   The permittee shall demonstrate compliance with the SO2 emission limitation above based upon the record keeping requirements specified in Section A.III.3 and the use of the equation contained in OAC rule 3745-18-04(F)(1).

   If required, compliance shall also be based upon stack testing in accordance with OAC rule 3745-18-04(D)(1).

   b. Emission Limitation-
   The PE from this emissions unit shall not exceed 0.14 pound per mmBTU of actual heat input.

   Applicable Compliance Method-
   The permittee shall demonstrate compliance with the PE limitation above based upon the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(9).

   c. Emission Limitation-
   The maximum annual PE from this emission unit shall not exceed 6.8 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 6.8 tons/yr.

   Applicable Compliance Method-
   Compliance with the annual PE limitation above shall be based upon multiplying the maximum annual coal usage of 12,322 tons (based upon the minimum heat content of 26 mmBtu/ton coal) by the controlled PE emissions factor of 0.0424

lb/mmBtu (obtained from stack testing).

d. Emission Limitation-
The maximum annual SO2 emissions from this emission unit shall not exceed 192.0 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 192.0 tons/yr.

Applicable Compliance Method-
Compliance with the annual SO2 emissions limitation above shall be based upon multiplying the maximum annual coal usage of 12,322 tons by the emission factor of 31.16 lb/ton coal (assuming a sulfur content of 0.82%), AP-42, Section 1.1, Table 1.1-3 (revise 9/98).

e. Emission Limitation-
The nitrogen oxides (NOx) emissions from this emissions unit shall not exceed 90 lbs/hour.

Applicable Compliance Method-
The permittee shall demonstrate compliance with the NOx emission limitation above based upon the results of stack testing conducted in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance may also be demonstrated by multiplying the maximum hourly coal burn rate of 6.58 tons (based upon the minimum heat content of 22.8 mmBTU/ton coal) by the emission factor of 11 lbs NOx/ton coal, AP-42, Section 1.1, Table 1.1-3 (revised 9/98).

f. Emission Limitation-
The maximum annual NOx emissions from this emission unit shall not exceed 67.8 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 67.8 tons/yr.

Applicable Compliance Method-
Compliance with the annual NOx emissions limitation above shall be based upon multiplying the maximum annual coal usage of 12,322 tons by the emission factor of by the emission factor of 11 lbs NOx/ton coal, AP-42, Section 1.1, Table 1.1-3 (revised 9/98).

g. Emissions Limitation-
The visible PE from this emissions unit shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method-
Ongoing compliance with the opacity limitation contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

If required, compliance may be demonstrated based on visible emission evaluations, using the methods and procedures specified in USEPA Reference Method 9, taken at any time the emissions unit is in operation by qualified observers certified in accordance with USEPA RM 9, 40 CFR, Part 60, Appendix A, Section 3, Qualifications and Testing.

h. Emissions Limitation-
The emissions of hazardous air pollutants (HAP) from the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on rolling, 12-month summations.

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirement specified in Section III.6 of this permit.

2. The permittee shall conduct, or have conducted, performance testing for the emissions unit to demonstrate compliance with the allowable mass emission rates for PE and NOx within six months prior to the Title V permit expiration date of December 27, 2007. The PE emission tests shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(9). The NOx emissions test shall be conducted in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 through 7E. The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the Director (the RAPCA). The dates of the testing shall coincide with the testing schedule requirements of the Title V permit for the facility.

3. The permittee shall conduct, or have conducted, emissions testing of this emissions unit to determine the HCl emissions removal efficiency. The emissions testing shall be performed in accordance with the following requirements:

a. The emissions testing shall be conducted on the emissions unit prior to employing a control efficiency by use of fuel additive for the purposes of calculating HCl emissions (see A.III.4).

b. The emissions testing shall be conducted to determine the emission rate of HCl in pounds per hour. The emission rate of HCl shall be used to calculate the

control efficiency (see A.V.3.e).

c. The following test method(s) shall be employed to demonstrate the mass emission rate(s): Method 26 or 26A of 40 CFR Part 60, as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the Director (the RAPCA).

e. 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 Director (the RAPCA) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the RAPCA).

The written report shall include:

i. the type and amount of fuel additive applied, in pounds, during each run of the emission test;

ii. the amount of coal utilized, in tons, during each run of the emission test;

iii. the potential/theoretical uncontrolled HCl emissions, in pounds/hour, for each run of the emission test calculated using the mass balance approach in Section A.III.4.e that assumes 100% of the chlorine contained in the coal is converted to HCl;

iv. the actual HCl emission rate during each run of the emission test from the emissions unit; and

v. the HCl control efficiency of the fuel additive calculated for each run of the emission test [(A.V.3.e.iii - A.V.3.e.iv)/A.V.3.e.iii] x 100

4. Not later than 60 days prior to the proposed emissions test date(s), this facility shall submit an "Intent to Test" notification to the Director (the RAPCA). 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 Director (the RAPCA's) refusal to accept the results of the emission test(s).

   Personnel from the Director (the RAPCA) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

   A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the RAPCA) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the RAPCA).

VI. Miscellaneous Requirements

1. The terms and conditions of this PTI supercedes those of PTI 08-057 issued 05/02/1979.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
B003 - 150 mmBTU/hr coal spreader stoker boiler; Boiler No. 3, with cyclone and baghouse	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
B004 - 150 mmBTU/hr coal spreader stoker and natural gas boiler; Boiler No. 4, with cyclone and baghouse	OAC rule 3745-18-63(Q)(2)	
*Modification	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-10(C)(1)

Emissions Unit ID: B004

	Applicable Emissions Limitations/Control Measures	
OAC rules 3745-17-10(B)(1)	The sulfur dioxide (SO2) emissions from this emissions unit shall not exceed 1.2 lbs/mmBTU of actual heat input.	The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-63(Q)(2), 3745-17-07(A), 3745-21-08(B), and 3745-23-06(B).
OAC rules 3745-21-08(B) and 3745-23-06(B)	The particulate emissions (PE) from this emission unit shall not exceed 0.06 lb/mmBtu actual heat input for this emission unit when burning coal.	The visible PE from this emissions unit shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.
OAC rule 3745-35-07(B) (Synthetic Minor to avoid MACT)	The PE from this emissions unit shall not exceed 0.02 pound per mmBtu of actual heat input when burning natural gas.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	The maximum annual PE from this emissions unit shall not exceed 6.8 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 6.8 tons/yr.	The PE from this emissions unit shall not exceed 0.02 pound per mmBtu of actual heat input when burning natural gas. See Section A.I.2.a.
	The maximum annual SO2 emissions from this emissions unit shall not exceed 192.0 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 192.0 tons/yr	See Section A.I.2.b and A.II.3.
	The nitrogen oxides (NOx) emissions from this emissions unit shall not exceed 90 lbs/hour.	
	The maximum annual NOx emissions from this emissions unit shall not exceed 67.8 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 67.8 tons/yr.	

2. Additional Terms and Conditions

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

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.b The emissions of HAPs, as identified in Section 112(b) of Title III of the Clean Air Act, from the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on rolling, 12-month summations.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 12 inches of water while the emissions unit is in operation.

2. The quality of coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limits in Section A.I.

3. The maximum rolling, 12-month coal throughput for emissions units B003 and B004, combined is limited by the following equation:

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□ □ [□U_n□□C_n/100)(36/35){1- (R_n) x (K/100)}] ≤ 9.90 tons/yr, based on a

rolling
M=1 n 12-month summation

where,

M = the increment emissions of the rolling 12-month period;

n = individual lot of coal* utilized during the period;

U_n = the throughput of coal for each individual lot n, in tons;

C_n = chlorine content in weight % for each individual coal lot n

(36/35) = molecular weight of chloride is 35 lb/lb-mole and hydrochloric acid is 36 lb/lb-mole

R_n = a value of 1 (one) when fuel additive is employed for HCl control for coal throughput U_n, R_n equals a value of 0 (zero) when no fuel additive is employed for coal throughput U_n

K = % control efficiency for fuel additive as determined during the most recent performance test (see A.V.3).

*An individual lot of coal, n, is defined as an amount of coal utilized which is consistent in chlorine content and the application or non-application of fuel additive (e.g., lot 1 = 0.1% chlorine & fuel additive applied, lot 2 = 0.1% chlorine & no fuel additive applied, lot 3 = 0.2% chlorine & fuel additive applied, etc)

The equation above assumes 100% of the chlorine contained in the coal is converted to HCl.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the coal throughput for emissions units B003 and B004, combined is limited by the following:

Month	☐ [☐U_n☐☐C_n/100)(36/35){1- (R_n) x (K/100)}] n is less than or equal to
1	1.98
1-2	3.96
1-3	5.94
1-4	7.92
1-12	9.9

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coal throughput restriction shall be based upon a rolling, 12-month summation.

4. When fuel additive is employed to control HCl emissions, the application rate, in pounds of fuel additive per ton of coal processed, shall be maintained at a level of not less than the rate established during the most recent performance test (see A.V.3).

5. The maximum annual coal throughput for emissions units B003 and B004, combined, shall not exceed 12,322 tons/year.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

   Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

   Each monthly composite sample of coal shall be analyzed for chlorine content (percent). The analytical methods for chlorine content shall be the most recent version of SW-846-9250 or ASTM E776-87 or equivalent.

3. The permittee shall maintain monthly records of the following information:

   a. total quantity of coal received;

   b. results of the analyses for ash content, sulfur content, heat content, and chlorine content for the composite sample; and

   c. the calculated sulfur dioxide emission rate (in lb/mmBTU) for the composite sample.

4. The permittee shall maintain records of the following information each month for emissions units B003 and B004, combined:

   a. the company identification of each lot of coal (as defined in A.II.3) utilized;

   b. documentation as to whether or not fuel additive was applied for each lot of coal utilized;

   c. the chlorine content, in weight percent, for each lot of coal utilized;

   d. the quantity, in tons, of each lot of coal utilized;

   e. the calculated HCl emissions from each lot of coal, in tons, using the following equation:

      $E_n = [\square U_n \square \square C_n/100)(36/35)\{1- (R_n) \times (K/100)\}]$

      where,

      E_n = HCl emissions from individual coal lots utilized;

      All other variables are the same as described in A.II.3;

   f. the total HCl emission rate of all coal lots utilized, in tons/month, calculated as follows:

      $E_M = E_1 + E_2 + E_3 + ... + E_n$

      where:

      E_M = Monthly HCl emissions, in tons/month; and
      E_n = HCl emissions from each individual lot of coal utilized (A.III.4.e); and

   g. the rolling, 12-month summation of the HCl emission rate calculated as follows:

$E_T = E_{M1} + E_{M2} + E_{M3} + ... + E_{M12}$

where:

E_T = Annual HCl emissions (tons) as summed from the previous 12 months of monthly HCl emissions for emissions units B003 and B004, combined; and

E_M = Monthly HCl emissions (tons/month) for emissions units B003 and B004.

5. For each lot of coal that fuel additive is employed, the permittee shall maintain the following records for emissions units B003 and B004:

   a. the type and amount of fuel additive applied, in pounds;

   b. the amount of coal utilized, in tons; and

   c. the resulting feed rate of the fuel additive, in pounds/ton of coal utilized.

6. The permittee shall collect and record the following information each month for the entire facility for the purpose of determining the HAP* emissions:

   a. the total (after control) individual HAP emissions for each HAP, in tons;

   b. the total combined HAPs emissions (all combustion related HAPs emissions from this emissions unit plus HAPs emissions from other emissions units located at the facility), in tons;

   c. the rolling, 12-month summation of individual HAP emissions for each HAP, in tons; and

   d. the rolling, 12-month summation of total combined HAPs emissions, in tons.

   The total (after control) HAPs emission rates shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

   *A listing of the Hazardous Air Pollutants can be found n Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

7. The permittee shall operate and maintain the continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from this emissions unit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

   The permittee shall maintain records of data obtained by the continuous opacity

monitoring system including, but not limited to:

a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

The permittee shall maintain on-site documentation from the U.S. EPA or the Ohio EPA verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware,

8. The permittee shall develop and maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all

periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The permittee shall notify the Director (the RAPCA) in writing of any record that shows a deviation of the allowable sulfur dioxide limitation (lb/mmBTU), as shown by the calculated sulfur dioxide emission rates from Section A.III.3 above. The notification shall include a copy of such record and shall be sent to the Director (the RAPCA) within 45 days after the deviation occurs.

   Compliance with the sulfur dioxide emissions limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate using a weighted average from the analyses of the composite samples.

3. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any deviations of the maximum allowable cumulative coal throughput specified in Section A.II.3 for emissions units B003 and B004, combined.

4. The permittee shall submit quarterly deviation (excursion) reports that summarize the following:

   a. which identify all exceedances of the rolling, 12-month coal throughput restriction for emissions units B003 and B004, combined specified in Section A.II.3;

   b. all exceedances of the facility rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 and 24.9 tons, respectively.

   These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

5. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all lots of coal utilized in this emission unit when fuel additive was applied and the fuel additive feed rate in pounds of fuel additive per tons of coal utilized was not maintained at or above the level as specified in Section A.II.4.

6. The permittee shall submit annual reports that summarize the actual annual individual HAP emissions from the facility, and the actual annual combined HAPs emissions from the facility. The report shall be submitted by January 31 of each year and shall cover for the previous calendar year.

7. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:

   a. Pursuant to the monitoring, record keeping, and reporting requirements for

continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. If there are no exceedances during the calendar quarter, the permittee shall submit a statement to that effect.

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

(i) the facility name and address;

(ii) the manufacturer and model number of the continuous opacity monitor;

(iii) the location of the continuous opacity monitor;

(iv) the exceedance report as detailed in (a) above;

(v) the total operating time (hours) of the emissions unit;

(vi) the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;

(vii) the date, time, and duration of any/each malfunction* of the continuous opacity monitoring system, emissions unit, and/or control equipment;

(viii) the date, time, and duration of any downtime* of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and

(ix) the reason (if known) and the corrective actions taken (if any) for each event in (b)(7) and (8).

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

* each downtime and malfunction event shall be reported regardless if there is an exceedance of the opacity limit

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation-
   The SO2 emissions from this emission unit shall not exceed 1.2 pounds per mmBtu of actual heat input.

   Applicable Compliance Method-
   When burning coal, the permittee shall demonstrate compliance with the SO2 emission limitation above based upon the record keeping requirements specified in Section A.III.3 and the use of the equation contained in OAC rule 3745-18-04(F)(1).

   When burning natural gas, compliance with the allowable SO2 emission limitation above will be assumed due to the negligible sulfur in the fuel.

   If required, compliance shall also be based upon stack testing in accordance with OAC rule 3745-18-04(D)(1).

   b. Emission Limitation-
   The PE from this emissions unit shall not exceed 0.06 pound per mmBtu of actual heat input when burning coal.

   Applicable Compliance Method-
   The permittee shall demonstrate compliance with the PE limitation above based upon the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(9).

   c. Emission Limitation-
   The maximum annual PE from this emission unit shall not exceed 6.8 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 6.8 tons/yr.

   Applicable Compliance Method-
   Compliance with the annual PE limitation above shall be based upon multiplying the maximum annual coal usage of 12,322 tons (based upon the minimum heat content of 26 mmBtu/ton coal) by the controlled PE emissions factor of 0.0424 lb/mmBtu (obtained from stack testing).

   d. Emission Limitation-

The maximum annual SO2 emissions from this emission unit shall not exceed 192.0 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 192.0 tons/yr.

Applicable Compliance Method-
Compliance with the annual SO2 emissions limitation above shall be based upon multiplying the maximum annual coal usage of 12,322 tons by the emission factor of 31.16 lb/ton coal (assuming a sulfur content of 0.82%), AP-42, Section 1.1, Table 1.1-3 (revise 9/98).

e. Emission Limitation-
The nitrogen oxides (NOx) emissions from this emissions unit shall not exceed 90 lbs/hour.

Applicable Compliance Method-
The permittee shall demonstrate compliance with the NOx emission limitation above based upon the results of stack testing conducted in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance may also be demonstrated by multiplying the maximum hourly coal burn rate of 6.58 tons (based upon the minimum heat content of 22.8 mmBTU/ton coal) by the emission factor of 11 lbs NOx/ton coal, AP-42, Section 1.1, Table 1.1-3 (revised 9/98).

f. Emission Limitation-
The maximum annual NOx emissions from this emission unit shall not exceed 67.8 tons/yr, and the combined total from emissions units B003 and B004 shall not exceed 67.8 tons/yr.

Applicable Compliance Method-
Compliance with the annual NOx emissions limitation above shall be based upon multiplying the maximum annual coal usage of 12,322 tons by the emission factor of by the emission factor of 11 lbs NOx/ton coal, AP-42, Section 1.1, Table 1.1-3 (revised 9/98).

g. Emissions Limitation-
The visible PE from this emissions unit shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method-
Ongoing compliance with the opacity limitation contained in this permit, 40 CFR

Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

If required, compliance may be demonstrated based on visible emission evaluations, using the methods and procedures specified in USEPA Reference Method 9, taken at any time the emissions unit is in operation by qualified observers certified in accordance with USEPA RM 9, 40 CFR, Part 60, Appendix A, Section 3, Qualifications and Testing.

h. Emissions Limitation-
The emissions of hazardous air pollutants (HAP) from the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on rolling, 12-month summations.

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirement specified in Section III.6 of this permit.

2. The permittee shall conduct, or have conducted, performance testing for the emissions unit to demonstrate compliance with the allowable mass emission rates for PE and NOx within six months prior to the Title V permit expiration date of December 27, 2007. The PE emission tests shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(9). The NOx emissions test shall be conducted in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 through 7E. The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the Director (RAPCA). The dates of the testing shall coincide with the testing schedule requirements of the Title V permit for the facility.

3. The permittee shall conduct, or have conducted, emissions testing of this emissions unit to determine the HCl emissions removal efficiency. The emissions testing shall be performed in accordance with the following requirements:

a. The emissions testing shall be conducted on the emissions unit prior to employing a control efficiency by use of fuel additive for the purposes of calculating HCl emissions (see A.III.4).

b. The emissions testing shall be conducted to determine the emission rate of HCl in pounds per hour. The emission rate of HCl shall be used to calculate the control efficiency (see A.V.3.e).

c. The following test method(s) shall be employed to demonstrate the mass emission rate(s): Method 26 or 26A of 40 CFR Part 60, as appropriate.

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

d. The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the Director (the RAPCA).

e. 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 Director (the RAPCA) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the RAPCA).

The written report shall include:

i. the type and amount of fuel additive applied, in pounds, during each run of the emission test;

ii. the amount of coal utilized, in tons, during each run of the emission test;

iii. the potential/theoretical uncontrolled HCl emissions, in pounds/hour, for each run of the emission test calculated using the mass balance approach in Section A.III.4.e that assumes 100% of the chlorine contained in the coal is converted to HCl;

iv. the actual HCl emission rate during each run of the emission test from the emissions unit; and

v. the HCl control efficiency of the fuel additive calculated for each run of the emission test [(A.V.3.e.iii - A.V.3.e.iv)/A.V.3.e.iii] x 100

4. Not later than 60 days prior to the proposed emissions test date(s), this facility shall submit an "Intent to Test" notification to the Director (the RAPCA). 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 Director (the RAPCA's) refusal to accept the results of the emission test(s).

Personnel from the Director (the RAPCA) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure

that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the RAPCA) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the RAPCA).

VI. Miscellaneous Requirements

1. The terms and conditions of this PTI supercedes those of PTI 08-144 issued 05/11/1979.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
B004 - 150 mmBTU/hr coal spreader stoker and natural gas boiler; Boiler No. 3, with cyclone and baghouse	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
K020 - Maintenance spray paint booth with water wash and dry filter system	OAC rule 3745-31-02(A)(2)	OAC rule 3745-17-07(A)
		OAC rule 3745-35-07(B) (Synthetic Minor to avoid MACT)
	OAC rule 3745-21-09(U)(2)(e)	
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-17-11(B)	

Applicable Emissions Limitations/Control Measures	
The volatile organic compounds (VOC) emissions shall not exceed 7.3 tons per year (TPY), including cleanup materials. See Section A.2 below. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2)(e), OAC rule 3745-21-07(G)(2), OAC rule 3745-17-11(B), and OAC rule 3745-17-07(A). The coating usage shall be less than or equal to 8 gallons per day. See A.2.a below. The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials. The particulate emissions (PE) shall not exceed 0.551 lb/hour, for coating both metal and non-metal parts.	The visible PE shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule. The emissions of hazardous air pollutants (HAP) from the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on rolling, 12-month summations.

2. Additional Terms and Conditions

2.a The allowable emission limitations while coating metal parts will also comply with allowable emission limits in OAC rule 3745-21-07(G)(2).

2.b The 8 lb/hr emission limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c The emissions of HAPs, as identified in Section 112(b) of Title III of the Clean Air Act, from the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on rolling, 12-month summations.

II. Operational Restrictions

1. The usage rate of coatings for this emissions unit shall not exceed 8 gallons per day.

2. The permittee shall operate the dry filter system for control of particulate emissions whenever this emission unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:

   a. The company name and identification of each coating and cleanup material employed.

   b. The number of gallons of each coating material employed.

   c. The number of gallons of cleanup material employed.

   d. The organic compound content of each coating and cleanup material employed, in pounds per gallon.

   e. The number of gallons of cleanup materials recovered for recycling or treatment.

   f. The organic compound emission rate from cleanup materials, in pounds, i.e., © - e) x (d) for cleanup materials employed.

   g. The organic compound emission rate from all coatings and cleanup materials, in pounds, i.e., (b x d) for coatings employed.

   h. The total organic compounds emissions rate from all coatings and cleanup materials, in pounds, i.e., (f + g).

2. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating and cleanup materials for the calendar year in Section A.III.1.]

3. The permittee shall collect and record the following information each month for the entire facility for the purpose of determining the HAP* emissions:

   a. the name and company identification of each coating material employed;

   b. the number of gallons of each coating material employed;

   c. the individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied;

   d. the total combined HAPs content of each coating material employed, in pounds of combined HAPs per gallon [i.e., the sum of individual HAP contents from (c)], as applied;

   e. the number of gallons of each cleanup material employed;

   f. the individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied;

   g. the total combined HAPs content of each cleanup material employed, in pounds of combined HAPs per gallon [i.e., the sum of individual HAP contents from (f)], as applied;

   h. the rolling, 12-month summation of total individual HAP emissions for each HAP from all the coatings and cleanup materials employed, in tons; and

   i. the rolling, 12-month summation of total combined HAPs emissions from all the coatings and cleanup materials, in tons.

   *A listing of the Hazardous Air Pollutants can be found n Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

   Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the organic compound emissions from the coatings and cleanup materials used exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

   The quarterly deviation reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

4. The permittee shall submit annual reports that summarize the actual annual total OC emissions from this emissions unit, the actual annual individual HAP emissions from the facility, and the actual annual combined HAPs emissions from the facility. These reports shall be submitted by April 15 of each year of each year and shall cover for the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation-
      The VOC emissions from this emissions unit shall not exceed 7.3 tons per year, including cleanup materials.

      Applicable Compliance Method-
      Compliance shall be determined by the record keeping requirements specified in Section A.III.2 of this permit.

b. Emission Limitation-
The coating usage shall be less than or equal to 8 gallons per day.

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in A.III.1 of this permit.

c. Emissions Limitations:
The organic compounds (OC) shall not exceed 8 lb/hour and 40 lb/day, including both coatings and cleanup materials.

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

If required, compliance with the hourly allowable OC emission limitation shall be demonstrated in accordance with Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:
The particulate emissions (PE) shall not exceed 0.551 lb/hour, for coating both metal and non-metal parts.

Applicable Compliance Method: Compliance with the hourly PE limitation may be demonstrated by utilizing the following equation:

E = (maximum coating solids usage rate, in pounds per hour) x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed.

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

e. Emission Limitation:
The visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitation:
The emissions of hazardous air pollutants (HAP) from the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on rolling, 12-month summations.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in A.III.3 of this permit.

2. Formulation data shall be used to determine the HAP and organic compound contents of the coating and cleanup materials. If formulation data is not available and/or if required by the regulating agency, Method 24 or 24A of 40 CFR Part 60, Appendix A shall be conducted for the organic content of the solvent materials applied. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K020 - Maintenance spray paint booth with water wash and dry filter system	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	OAC rule 3745-35-07(B) (Synthetic Minor to avoid MACT)
K029 - F-shock paint (electrostatic spray) with water wash and dry filter exhaust system *Modification	OAC rule 3745-31-05 (A)(3)	
	OAC rule 3745-21-09(U)(1)(c)	
	OAC rule 3745-17-11(B)	
	OAC rule 3745-17-07(A)	

Applicable Emissions Limitations/Control Measures	
The volatile organic compound (VOC) emissions shall not exceed 4.76 lbs/hour and 5.85 TPY, including cleanup. See Section A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-17-07(A), 3745-17-11(B) and 3745-35-07(B). The volatile organic compound (VOC) content of the coatings shall not exceed 3.5 per gallon of coating, excluding water and exempt solvents (See A.II.2.) The particulate emissions (PE) shall not exceed 0.551 lb/hr. The visible PE shall not exceed 20 percent opacity, as a 6-minute average, except except as provided by the rule. The emissions of	hazardous air pollutants (HAP) shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on rolling, 12-month summations.

2. Additional Terms and Conditions

2.a The 4.76 lb/hr emission limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.c The emissions of HAPs, as identified in Section 112(b) of Title III of the Clean Air Act, from the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on rolling, 12-month summations.

II. Operational Restrictions

1. The permittee shall operate the water wash and dry filter system when this emissions unit is in operation.

2. Each coating employed in this emissions unit shall comply with the VOC content listed in A.I.1 on an "as applied" basis.

3. The maximum annual coatings usage for this emissions units shall not exceed shall not exceed 14,400 gallons per year based on a rolling, 12-month summation.

4. The maximum annual cleaning materials usage for this emissions units shall not exceed shall not exceed 120 per year based on a rolling, 12-month summation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions unit:

   a. the name and identification number of each coating, as applied; and

   b. the VOC content of each coating (excluding water and exempt solvents), as applied.

   (This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit-to-install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information each month for the emission unit for the purpose of determining annual VOC emissions:

   a. the name and identification of each cleanup material employed;

   b. the VOC content of each cleanup material, in pounds per gallon;

   c. the number of gallons of each cleanup material employed;

   d. the number of gallons of each coating material employed;

   e. the number of gallons (excluding water and exempt solvents) of each coating employed;

   f. the total VOC emissions from all cleanup materials employed [(III.2.b.) x (III.2.c.)], in pounds;

   g. the total VOC emissions from all coatings materials employed [(III.2d.) x (III.1.e.)], in pounds; and

   h. the total VOC emissions from all coatings and cleanup materials employed [(III.2.f.) + (III.1.g.)] , in pounds or tons.

   (This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit-to-install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

3. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the coating and cleanup materials for the calendar year in Section A.III.2.]

4. The permittee shall collect and record the following information each month for both this emissions unit and for entire facility for the purpose of determining the HAP* emissions:

   a. the name and company identification of each coating material employed;

   b. the number of gallons of each coating material employed;

   c. the individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied;

   d. the total combined HAPs content of each coating material employed, in pounds

of combined HAPs per gallon [i.e., the sum of individual HAP contents from (c)], as applied;

e. the number of gallons of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied;

g. the total combined HAPs content of each cleanup material employed, in pounds of combined HAPs per gallon [i.e., the sum of individual HAP contents from (f)], as applied;

h. the rolling, 12-month summation of total individual HAP emissions for each HAP from all the coatings and cleanup materials employed, in tons; and

i. the rolling, 12-month summation of total combined HAPs emissions from all the coatings and cleanup materials, in tons.

*A listing of the Hazardous Air Pollutants can be found n Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

5. The permittee shall maintain daily records that document any time periods when the water wash and dry filtration system was not in service when the emission unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or

local air agency) within 45 days after the event occurs.

3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

4. The permittee shall submit annual reports that summarize the actual annual individual HAP emissions from this emission unit, and the actual annual combined HAPs emissions from this emission unit, the actual annual individual HAP emissions from the facility, and the actual annual combined HAPs emissions from the facility. These reports shall be submitted by April 15 of each year of each year and shall cover for the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation-
   The VOC emissions from this emissions unit shall not exceed 4.76 lbs/hour, including cleanup.

   Applicable Compliance Method-
   The hourly allowable VOC emission limitation was established by multiplying the maximum hourly, as applied, coating usage rate (3.75 gal/hour) by the worst case coating VOC content (1.208 lb/gal), and adding the hourly cleanup material usage rate (0.23 lbs/hour).

   b. Emission Limitation-
   The VOC emissions shall not exceed 5.85 TPY, including cleanup.

   Applicable Compliance Method-
   Compliance shall be based upon the record keeping requirements specified in Section A.III.2. of this permit, and shall be the sum of the monthly VOC emission rates for the calendar year, divided by 2000.

   c. Emission Limitation-
   The VOC content of the coatings shall not exceed 3.5 per gallon of coating, excluding water and exempt solvents.

   Applicable Compliance Method-
   Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

d. Emission Limitation-
The particulate emissions (PE) shall not exceed 0.551 lb/hr.

Applicable Compliance Method-
Compliance with the hourly PE limitation may be demonstrated by utilizing the following equation:

E = (maximum coating solids usage rate, in pounds per hour) x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids employed

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

e. Emission Limitation-
The visible PE shall not exceed 20 percent opacity, as a 6-minute average, except except as provided by the rule.

Applicable Compliance Method-
If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitation-
The HAP emissions for the facility shall not exceed 9.9 tons/yr for a single HAP and 24.9 tons/yr for any combination of HAPs, based on rolling, 12-month summations.

Applicable Compliance Method-
Compliance shall be determined by the record keeping requirements specified in Section A.III.4 of this permit.

2. Formulation data shall be used to determine the HAP and organic compound contents

of the coating and cleanup materials. If formulation data is not available and/or if required by the regulating agency, Method 24 or 24A of 40 CFR Part 60, Appendix A shall be conducted for the organic content of the solvent materials applied. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

VI. Miscellaneous Requirements

1. The terms and conditions of this PTI supercedes those of PTI 08-1802 issued 10/04/1989.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K029 - F-shock paint (electrostatic spray) with water wash and dry filter exhaust system	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None