



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MONTGOMERY COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 08-04350

DATE: 4/2/2002

Ovonic Energy Products
Matt Jonas
4991 Hempstead Sta Dr
Kettering, OH 454295159

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 4/2/2002
Effective Date: 4/2/2002**

FINAL PERMIT TO INSTALL 08-04350

Application Number: 08-04350
APS Premise Number: 0857083229
Permit Fee: **\$800**
Name of Facility: Ovonic Energy Products
Person to Contact: Matt Jonas
Address: 4991 Hempstead Sta Dr
Kettering, OH 454295159

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4991 Hempstead Sta Dr
Kettering, Ohio**

Description of proposed emissions unit(s):
nickel based battery production.

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

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. 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.

11. 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).

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate Emissions	0.00074

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Positive Paster Line 1 with a Dust Collector and a HEPA filter	OAC rule 3745-31-05(A)(3)	0.000077 lb/hr and 0.00034 TPY particulate emissions (PE)
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 10% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(A)(2)	The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 0.000077 lb PE/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

1. The pressure drop across each HEPA filter shall be maintained within the range of 0.5 to 1.5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the purpose of determining annual compliance:
 - a. The company name and identification for each mixture applied.
 - b. The quantity of each mixture applied, in pounds or tons .
2. The permittee shall properly install, operate, and maintain monitoring equipment and a recorder which continuously measure and record the pressure drop across the HEPA filter while the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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

- a. The pressure drop, on a once per shift basis.
 - b. Whether or not the HEPA filter was in service when the emissions unit was in operation.
3. The permit to install for emissions unit P001- P004 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Nickel

TLV (mg/m³): 0.1

Maximum Hourly Emission Rate (lbs/hr): 1.22×10^{-4}

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 0.0343

MAGLC (ug/m3): 1.0

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

Emissions Unit ID: P001

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of all periods of time during which the pressure drop across the HEPA filter did not comply with the allowable range specified above.
 - b. An identification of any record showing that the HEPA filter was not in service when the emissions unit was in operation.

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission Limitation -
0.000077 lb PE/hr

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum paste usage rate of 82.6 pounds paste solids per hour by the company derived emission factor of 0.93% by weight of total solids applied. The results shall then be multiplied by a factor of 1 minus the minimum control efficiency, i.e. (1 - 0.9999).

If required, the company derived emission factor shall be verified by performing a material balance for this emissions unit.

- b. Emission Limitation -
0.00034 TPY PE

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.1. and shall be the summation of the monthly usage rates multiplied by the company derived emission factor of 0.93% by weight of total solids applied. The results shall then be multiplied by a factor of 1 minus the minimum control efficiency, i.e. (1 - 0.9999) and divided by 2000 lbs/ton.

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Emissions Unit ID: **P001**

- c. Emission Limitation -
Visible particulate emissions shall not exceed 10% opacity, as a 6-minute average

Applicable Compliance Method -
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures in USEPA Reference Method 9.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Positive Paste Mixing Operation with a Dust Collector and a HEPA filter	OAC rule 3745-31-05(A)(3)	0.000022 lb/hr and 0.000018 TPY particulate emissions (PE)
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 10% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(A)(2)	The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 0.000022 lb/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

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PTI A

Issued: 4/2/2002

Emissions Unit ID: **P002**

1. The pressure drop across each HEPA filter shall be maintained within the range of 0.5 to 1.5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the purpose of determining annual compliance:
 - a. The company name and identification for each mixture applied.
 - b. The quantity of each mixture applied, in pounds or tons .
2. The permittee shall properly install, operate, and maintain monitoring equipment and a recorder which continuously measure and record the pressure drop across the HEPA filter while the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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

- a. The pressure drop, on a once per shift basis.
 - b. Whether or not the HEPA filter was in service when the emissions unit was in operation.
3. The permit to install for emissions unit P001- P004 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Nickel

TLV (mg/m³): 0.1

Maximum Hourly Emission Rate (lbs/hr): 1.22×10^{-4}

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 0.0343

MAGLC (ug/m3): 1.0

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of all periods of time during which the pressure drop across the HEPA filter did not comply with the allowable range specified above.
 - b. An identification of any record showing that the HEPA filter was not in service when the emissions unit was in operation.

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission Limitation -
0.000022 lb PE/hr

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum capacity of 440.52 pounds paste solids per hour by the company derived emission factor of 0.05% by weight of total solids applied. The results shall then be multiplied by a factor of 1 minus the minimum control efficiency, i.e. (1 - 0.9999).

If required, the company derived emission factor shall be verified by performing a material balance for this emissions unit.

- b. Emission Limitation -
0.000018 TPY PE

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.1. and shall be the summation of the monthly usage rates multiplied by the company derived emission factor of 0.05% by weight of total solids applied. The results shall then be multiplied by a factor of 1 minus the minimum control efficiency, i.e. (1 - 0.9999) and divided by 2000 lbs/ton.

- c. Emission Limitation -

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Emissions Unit ID: **P002**

Visible particulate emissions shall not exceed 10% opacity, as a 6-minute average

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures in USEPA Reference Method 9.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Negative Paster Line 1 with a Dust Collector and a HEPA filter	OAC rule 3745-31-05(A)(3)	0.000083 lb/hr and 0.00036 TPY particulate emissions (PE)
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 10% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(A)(2)	The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 0.000083 lb/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

1. The pressure drop across each HEPA filter shall be maintained within the range of 0.5 to 1.5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the purpose of determining annual compliance:
 - a. The company name and identification for each mixture applied.
 - b. The quantity of each mixture applied, in pounds or tons .
2. The permittee shall properly install, operate, and maintain monitoring equipment and a recorder which continuously measure and record the pressure drop across the HEPA filter while the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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

- a. The pressure drop, on a once per shift basis.
 - b. Whether or not the HEPA filter was in service when the emissions unit was in operation.
3. The permit to install for emissions unit P001- P004 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Nickel

TLV (mg/m³): 0.1

Maximum Hourly Emission Rate (lbs/hr): 1.22×10^{-4}

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 0.0343

MAGLC (ug/m3): 1.0

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

Emissions Unit ID: P003

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of all periods of time during which the pressure drop across the HEPA filter did not comply with the allowable range specified above.
 - b. An identification of any record showing that the HEPA filter was not in service when the emissions unit was in operation.

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission Limitation -
0.000083 lb PE/hr

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum paste usage rate of 89.4 pounds paste solids per hour by the company derived emission factor of 0.93% by weight of total solids applied. The results shall then be multiplied by a factor of 1 minus the minimum control efficiency, i.e. (1 - 0.9999).

If required, the company derived emission factor shall be verified by performing a material balance for this emissions unit.

- b. Emission Limitation -
0.00036 TPY PE

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section C.1. and shall be the summation of the monthly usage rates multiplied by the company derived emission factor of 0.93% by weight of total solids applied. The results shall then be multiplied by a factor of 1 minus the minimum control efficiency, i.e. (1 - 0.9999) and divided by 2000 lbs/ton.

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PTI Application: 08 04350
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Facility ID: 0857083229

Emissions Unit ID: **P003**

- c. Emission Limitation -
Visible particulate emissions shall not exceed 10% opacity, as a 6-minute average

Applicable Compliance Method -
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures in USEPA Reference Method 9.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - Negative Paste Mixing Operation with a Dust Collector and a HEPA filter	OAC rule 3745-31-05(A)(3)	0.000022 lb/hr and 0.000018 TPY particulate emissions (PE)
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 10% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(A)(2)	The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 0.000022 lb/hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B. Operational Restrictions

1. The pressure drop across each HEPA filter shall be maintained within the range of 0.5 to 1.5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the purpose of determining annual compliance:
 - a. The company name and identification for each mixture applied.
 - b. The quantity of each mixture applied, in pounds or tons .
2. The permittee shall properly install, operate, and maintain monitoring equipment and a recorder which continuously measure and record the pressure drop across the HEPA filter while the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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

- a. The pressure drop, on a once per shift basis.
 - b. Whether or not the HEPA filter was in service when the emissions unit was in operation.
3. The permit to install for emissions unit P001- P004 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Nickel

TLV (mg/m³): 0.1

Maximum Hourly Emission Rate (lbs/hr): 1.22×10^{-4}

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 0.0343

MAGLC (ug/m3): 1.0

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that

show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of all periods of time during which the pressure drop across the HEPA filter did not comply with the allowable range specified above.
 - b. An identification of any record showing that the HEPA filter was not in service when the emissions unit was in operation.

E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
 - a. Emission Limitation -
0.000022 lb PE/hr

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum capacity of 440.52 pounds paste solids per hour by the company derived emission factor of 0.05% by weight of total solids applied. The results shall then be multiplied by a factor of 1 minus the minimum control efficiency, i.e. (1 - 0.9999).

If required, the company derived emission factor shall be verified by performing a material balance for this emissions unit.
 - b. Emission Limitation -
0.000018 TPY PE

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1. and shall be the summation of the monthly usage rates multiplied by the company derived emission factor of 0.05% by weight of total solids applied. The results shall then be multiplied by a factor of 1 minus the minimum control efficiency, i.e. (1 - 0.9999) and divided by 2000 lbs/ton.
 - c. Emission Limitation -

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PTI Application: 08 04350
Issued

Facility ID: 0857083229

Emissions Unit ID: **P004**

Visible particulate emissions shall not exceed 10% opacity, as a 6-minute average

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures in USEPA Reference Method 9.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 08-04350 Facility ID: 0857083229

FACILITY NAME Ovonic Energy Products

FACILITY DESCRIPTION nickel based batterv production. CITY/TWP Kettering

Emissions Unit ID: P004

SIC CODE 3692 SCC CODE 3-99-999-99 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION Positive Paster Line 1

DATE INSTALLED after PTI issued

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.000026 lb/hr	0.00011 TPY	0.000077 lb/hr	0.00034
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination BAT is compliance with specified OAC rules, allowable emission limitations, record keeping and reporting requirements, the use of HEPA filters and associated parametric monitoring/reporting requirements, and compliance with the Ohio Air Toxic Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: nickel

NEW SOURCE REVIEW FORM B

PTI Number: 08-04350 Facility ID: 0857083229

FACILITY NAME Ovonic Energy Products

FACILITY DESCRIPTION nickel based battery production. CITY/TWP Kettering

Emissions Unit ID: **P004**

SIC CODE 3692 SCC CODE 3-99-999-99 EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION Positive Paste Mixing Operation

DATE INSTALLED after PTI issued

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.000007 lb/hr	0.000006	0.000022 lb/hr	0.000018
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination BAT is compliance with specified OAC rules, allowable emission limitations, record keeping and reporting requirements, the use of HEPA filters and associated parametric monitoring/reporting requirements, and compliance with the Ohio Air Toxic Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: nickel

NEW SOURCE REVIEW FORM B

PTI Number: 08-04350 Facility ID: 0857083229

FACILITY NAME Ovonic Energy Products

FACILITY DESCRIPTION nickel based batterv production. CITY/TWP Kettering

Emissions Unit ID: P004

SIC CODE 3692 SCC CODE 3-99-999-99 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION Negative Paster Line 1

DATE INSTALLED after PTI issued

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.000028 lb/hr	0.00012	0.000083 lb/hr	0.00036
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination BAT is compliance with specified OAC rules, allowable emission limitations, record keeping and reporting requirements, the use of HEPA filters and associated parametric monitoring/reporting requirements, and compliance with the Ohio Air Toxic Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: nickel

NEW SOURCE REVIEW FORM B

PTI Number: 08-04350 Facility ID: 0857083229

FACILITY NAME Ovonic Energy Products

FACILITY DESCRIPTION nickel based battery production. CITY/TWP Kettering

Emissions Unit ID: **P004**

SIC CODE 3692 SCC CODE 3-99-999-99 EMISSIONS UNIT ID P004

EMISSIONS UNIT DESCRIPTION Negative Paste Mixing Operation

DATE INSTALLED after PTI issued

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.000007 lb/hr	0.000006	0.000022 lb/hr	0.000018
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination BAT is compliance with specified OAC rules, allowable emission limitations, record keeping and reporting requirements, the use of HEPA filters and associated parametric monitoring/reporting requirements, and compliance with the Ohio Air Toxic Policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: nickel