



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

11/27/2013

Certified Mail

Jeff Goldacker
Autolite
1600 N. Union Street
Fostoria, OH 44830

Facility ID: 0374010117
Permit Number: P0111649
County: Seneca

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Advertiser Tribune. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

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

PUBLIC NOTICE
11/27/2013 Issuance of Draft Air Pollution Title V Permit

Autolite

1600 N. Union Street,

Fostoria, OH 44830

Seneca County

FACILITY DESC.: Other Motor Vehicle Electrical and Electronic Equipment Manufacturing

PERMIT #: P0111649

PERMIT TYPE: Renewal

PERMIT DESC: Renewal Title V operating permit for a facility manufacturing spark plug testing engines.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



Statement of Basis
 Autolite
 Permit Number: P0111649
 Facility ID: 0374010117

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0374010117
Facility Name:	Autolite
Facility Description:	Spark plug testing engines.
Facility Address:	1600 N. Union Street, Fostoria, OH 44830
Permit #:	P0111649, Renewal

This facility is subject to Title V because it is major for:

- Lead
 Sulfur Dioxide
 Carbon Monoxide
 Volatile Organic Compounds
 Nitrogen Oxides
 Particulate Matter ≤ 10 microns
 Single Hazardous Air Pollutant
 Combined Hazardous Air Pollutants
 Maximum Available Control Technology Standard(s)
 GHG
 Title IV

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	YES
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	P073 (PTI #P0115617, issued 10/24/13) to reduce hourly fuel usage rates and adjust emission factors based on stack testing results; P073 (PTI #P0111650, issued 3/4/13) to reduce annual fuel usage rate; and P074 (PTI #P0114963, issued 7/29/13) to adjust emission factors and hourly emission limits based on stack testing results and reduce annual fuel usage rate.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Statement of Basis

Autolite

Permit Number: P0111649

Facility ID: 0374010117

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	P054 employs a scrubber for the control of PE.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
NA			

C. Emissions Unit Terms and Conditions

Key:
 EU = emissions unit ID
 ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
 OR = operational restriction
 M = monitoring requirements
 ENF = did noncompliance issues drive the monitoring requirements?
 R = record keeping requirements
 Rp = reporting requirements
 ET = emission testing requirements (not including compliance method terms)
 St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
 Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P073	24.75 lbs CO/hr	31-05(D)		N	Y	Y	N	Y	Y	Y	N	N	OR – The permittee shall only combust fuels that are equivalent to, or more clean burning than, benzene fuel, as stated in the



Statement of Basis

Autolite

Permit Number: P0111649

Facility ID: 0374010117

	2.48 lbsNOx/hr 0.85 lbsVOC/hr 0.03 lb PM10/hr 0.02 lb SO2/hr													<p>permit application. M/R/Rp requirements were established to verify compliance with the OR.</p> <p>M/R/Rp requirements are not necessary for the hourly limits because the limits reflect the potential to emit (PTE) of the emissions unit.</p> <p>ET – not required for PM10 and SO2 due to the negligible emission levels and use of AP-42 emission factors.</p>
P073	16.73 tons CO/rolling, 12 mos 1.68 tons NOx/rolling, 12 mos 0.57 ton VOC/rolling, 12 mos 0.02 ton PM10/rolling, 12 mos 0.02 ton SO2/rolling, 12 mos	31-05(D)		N	Y	Y	N	Y	Y	NA	N	N		<p>OR – The maximum, annual benzene fuel usage rate shall not exceed 3,000 gallons/rolling, 12 mos. M/R/Rp requirements were established to verify compliance with the OR.</p>
P074	216.25 lbs/hr 10.48 lbsNOx/hr 19.48 lbs VOC/hr 0.64 lb PM10/hr 0.54 lb	31-05(D)		N	Y	Y	N	Y	Y	Y	N	N		<p>OR – The permittee shall on combust fuels that are equivalent to, or more clean burning than, benzene fuel, as stated in the permit application. M/R/Rp requirements were established to verify compliance with the OR.</p> <p>M/R/Rp requirements are not necessary for the hourly limits because the limits reflect the PTE of the emissions unit.</p> <p>ET – not required for PM10 and SO2 due to the negligible emission levels and use of AP-42 emission factors.</p>



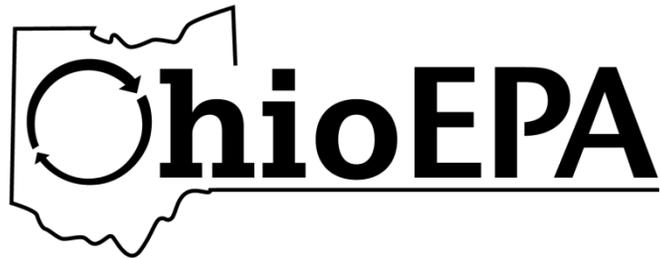
Statement of Basis

Autolite

Permit Number: P0111649

Facility ID: 0374010117

	SO2/hr												
P074	201.41 tons CO/rolling, 12 mos 9.76 tons NOx/rolling, 12 mos 18.14 tons VOC/rolling, 12 mos 0.60 ton PM10/rolling, 12 mos 0.50 ton SO2/rolling, 12 mos	31-05(D)		N	Y	Y	N	Y	Y	NA	N	N	OR – The maximum, annual benzene fuel usage rate shall not exceed 3,000 gallons/rolling, 12 mos
P073 P074	NA	31-05(A)(3)		N	N	N	N	N	N	N	N	N	Compliance with this rule includes compliance with OAC rules 3745: 31-05(D), 17-11(B)(5)a), and 17-07(A). Appropriate OR, M, R, Rp, and ET requirements have been established pursuant those rules.
P073 P074	0.310 lb PE/mmBtu	17-11(B)(5)(a)		N	N	N	N	N	N	N	N	N	This emission limitation from the SIP is applicable; however, it is higher than the PTE from this emissions unit.
P073 P074	20% opacity, as a 6-minute average	17-07(A)		N	Y	Y	N	Y	Y	N	N	N	OR – The permittee shall only combust fuels that are equivalent to, or more clean burning than, benzene fuel, as stated in the permit application. M/R/Rp requirements were established to verify compliance with the OR. ET – The fuel combusted in the emissions unit is inherently clean; therefore, the OR/M/R/Rp are sufficient to demonstrate compliance without requiring a Method 9.
P073 P074	NA	18-06(G)		Y	N	N	N	N	N	N	N	N	The emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).
P054	11.5 lbs PE/hr	17-11(B)(1)	40 CFR Part 64	N	Y	Y	N	Y	Y	Y	N	N	OR – The permittee shall use a scrubber to control PE. This emissions unit is subject to the requirements of CAM. The M/R/Rp requirements combined with additional maintenance and operating guidelines proposed in the permittee’s CAM plan are



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Autolite**

Facility ID:	0374010117
Permit Number:	P0111649
Permit Type:	Renewal
Issued:	11/27/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Autolite

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Draft Title V Permit

Autolite

Permit Number: P0111649

Facility ID: 0374010117

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0374010117
Facility Description: Spark plug testing engines.
Application Number(s): A0045812, A0047893
Permit Number: P0111649
Permit Description: Renewal Title V operating permit for a facility manufacturing spark plug testing engines.
Permit Type: Renewal
Issue Date: 11/27/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0087701

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Autolite
1600 N. Union Street
Fostoria, OH 44830

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Draft Title V Permit

Autolite

Permit Number: P0111649

Facility ID: 0374010117

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- 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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))



4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.



- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

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

(Authority for term: OAC rule 3745-77-07(B))



13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms



and conditions with which there has been continuous compliance throughout the year are not separately identified.

- b. The permittee's current compliance status.
- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
- d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
- e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))



16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)



23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention Requirements Under State Law Only

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.



26. 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.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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 Ohio EPA DAPC, Northwest District Office 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).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:



- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Draft Title V Permit

Autolite

Permit Number: P0111649

Facility ID: 0374010117

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

B011	Boiler #1: <10 mmBtu/hour natural gas boiler
B012	Boiler #2: <10 mmBtu/hour natural gas boiler
B013	Boiler #3: <10 mmBtu/hour natural gas boiler
B014	Boiler #4: <10 mmBtu/hour natural gas boiler
B015	Boiler #5: <10 mmBtu/hour natural gas boiler
P001	Dept. 3Turning: pressing, turning, and drilling operations for spark plug chalk
P075	250 kilowatt emergency generator (PBR08209)
P076	2.5mmBtu/hour Direct-Fire Natural Gas Ceramic Firing Kiln (PTI #P0114964)
P077	2.5mmBtu/hour Direct-Fire Natural Gas Ceramic Firing Kiln (PTI #P0114964)
P078	2.5mmBtu/hour Direct-Fire Natural Gas Ceramic Firing Kiln (PTI #P0114964)
P079	5.6mmBtu/hour Direct-Fire Natural Gas Ceramic Firing Kiln (PTI #P0114964)

[Authority for term: OAC rule 3745-77-07(A)(13)]



Draft Title V Permit

Autolite

Permit Number: P0111649

Facility ID: 0374010117

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P054, NIRO SPRAY DRYER (Dept 3)

Operations, Property and/or Equipment Description:

Niro ceramic spray dryer and cyclone with scrubber

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI #03-715, effective October 26, 1978]	See b(2)a.
b.	OAC rule 3745-17-11(B)(1)	11.5 pounds particulate emissions (PE)/hour
c.	OAC rule 3745-17-07(A)	Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
d.	40 CFR Part 64	Compliance Assurance Monitoring (CAM) See b)(2)b.; d)(1) through d)(7); and e)(2).

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emissions unit have been determined to be the use of a scrubber for the control of particulate emissions. BAT requirements also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A).

b. The permittee shall develop, implement, and maintain a Compliance Assurance Monitoring (CAM) Plan in accordance with the requirements of 40 CFR Part 64 for the control of PE from this emissions unit.



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM performance indicators for the scrubber controlling this emissions unit are the static pressure drop across the scrubber and scrubber water flow rate which were established in accordance with the manufacturer's recommendations. Indicator ranges were verified during site-specific particulate emissions testing during which scrubber parametric data was collected.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 64.3(a)(1); and 40 CFR Part 64.3(b)]

- (2) At all times, the permittee shall maintain the monitoring, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7(b)]

- (3) After approval of monitoring under this part, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the permitting authority, and if necessary, submit a proposed modification to the Part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7(e)]

- (4) The permittee shall properly operate and maintain equipment to monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

- a. The permittee shall collect and record the following information once-per-shift, during each day of operation:

- i. the static pressure drop across the scrubber, in inches of water; and
- ii. the scrubber water flow rate, in gallons per minute.

- b. During each day of operation, the permittee shall collect and record operating times for the following items:

- i. the capture (collection) system;
- ii. the control device;
- iii. the monitoring equipment; and



- iv. the associated emissions unit.
- c. Whenever the monitored values for the pressure drop and/or scrubber water flow rate deviate from the indicator range, the permittee shall restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

The permittee shall promptly investigate the cause of the deviation and shall maintain records of the following information for each investigation:

- i. the date and time the deviation began and the magnitude of the deviation at that time;
 - ii. the date(s) the investigation was conducted;
 - iii. the name(s) of the personnel who conducted the investigation; and
 - iv. the findings and recommendations.
- d. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the indicator range(s), unless the permittee determines that corrective action is not necessary.
 - i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective action was not necessary:
 - (a) the reason corrective action was not necessary; and
 - (b) the date and time the deviation ended.
 - ii. The permittee shall maintain records of the following information for each deviation when corrective action was taken:
 - (a) a description of the corrective action;
 - (b) the date it was completed;
 - (c) the date and time the deviation ended;
 - (d) the total period of time (in minutes) during which there was a deviation;
 - (e) the pressure drop and scrubber water flow rate immediately after the corrective action; and
 - (f) the name(s) of the personnel who performed the work.



iii. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

e. Pressure Drop Indicator Range

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall not be less than 3.0 inches of water (≥ 3.0 inches of water).

f. Scrubber Water Flow Rate Indicator Range

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber water flow rate, that must be maintained in order to demonstrate compliance, shall not be less than 16 gallons per minute (≥ 16 gpm).

g. The indicator ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved, in writing, by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range(s) based upon information obtained during future emission tests that demonstrate compliance with the allowable PE rate for this emissions unit. In addition, approved revisions to the range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor modification.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 64.3(a)(2); 40 CFR Part 64.7(a); 40 CFR Part 64.7(c); 40 CFR Part 64.7(d); and 40 CFR Part 64.9(b)]

(5) If it is determined by the appropriate Ohio EPA District Office or local air agency that the permittee has not used acceptable procedures in response to a deviation of the indicator range(s), the permittee may be required to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1); OAC rule 3745-77-07(A)(3)(b); and 40 CFR Part 64.8]

(6) The permittee shall conduct visual inspections of the scrubber's spray nozzles every six (6) months. At a minimum, each spray nozzle shall be inspected for the following:

- a. excessive wear or clogging; and
- b. the appropriate directional output to ensure that the spray is covering the entire gas stream.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7(b)]

(7) The permittee shall maintain a supply of replacement nozzles, or any other parts necessary to ensure that the scrubbing system will operate properly. Any worn or clogged nozzles shall be replaced or fixed during the inspection.



[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7(b)]

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-15-03(A)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the federally and State-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

- a. The permittee shall also include in the quarterly report, the following information concerning the operation of the control equipment:

- i. each incident (start time and date and end time and date) when the pressure drop across the scrubber deviated from the indicator range;
- ii. each incident (start time and date and end time and date) when the scrubber water flow rate deviated from the indicator range;
- iii. each incident (start time and date and end time and date) when the emissions unit was in operation and process emissions were not vented to the scrubber;
- iv. each incident of deviation described in e)(2)a.i. or e)(2)a.ii. where a prompt investigation was not conducted;
- v. each incident of deviation described in e)(2)a.i. or e)(2)a.ii. where prompt corrective action(s), that would bring the pressure drop and/or liquid flow rate into compliance with the indicator range(s), was determined to be necessary and was not taken; and
- vi. each incident of deviation described in e)(2)a.i. or e)(2)a.ii. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

[OAC rule 3745-77-07(C)(1); 40 CFR Part 64.7(d); 40 CFR Part 64.3(a); and 40 CFR Part 64.9(b)]

- (3) The permittee shall submit written reports that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in



accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

11.5 pounds PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based on the results of emission testing as conducted pursuant to USEPA Methods 1- 5 of 40 CFR Part 60, Appendix A.

[This emission limitation was established pursuant to Table 1 in the Appendix to OAC rule 3745-17-11(B) and is based on a maximum process weight rate of 9,230 pounds/hour, including the weight of water (as supplied in the permit application).]

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(10)]

b. Emission Limitation:

Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

(2) Emission Testing Requirements

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

a. The emission testing shall be conducted approximately 2.5 years after the effective date for the Title V permit, and/or as otherwise required in accordance with applicable rules, policies, etc. (i.e.: Engineering Guide #16, OAC rule 3745-15-04, revised Area Source Rule, etc.). The testing time frame specified may be amended or waived for cause upon prior request of, and written approval of, the appropriate Ohio EPA District Office or local air agency.



- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE and to determine the uncontrolled mass rate of particulate emissions from the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11.
- c. The following test method(s) shall be employed:
 - i. In order to demonstrate compliance with the allowable mass emission rate for PE, Methods 1- 5 of 40 CFR Part 60, Appendix A shall be conducted at the outlet of the control device.
 - ii. In order to determine the uncontrolled mass rate (UMRE) of particulate emissions from the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11, Method 5 of 40 CFR Part 60, Appendix A shall be conducted at the inlet of the control device.

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

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the



Draft Title V Permit

Autolite

Permit Number: P0111649

Facility ID: 0374010117

Effective Date: To be entered upon final issuance

submission of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



2. P073, RATING CELL

Operations, Property and/or Equipment Description:

Rating Cell – consists of 3 benzene-fired engines (only 2 can be fired at a time) – for testing spark plug rating specifications

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) [PTI #P0115617, issued October 24, 2013]	24.78 pounds carbon monoxide (CO)/hour; 16.73 tons CO per rolling, 12-month period 2.48 pounds nitrogen oxides (NOx)/hour; 1.68 tons NOx per rolling, 12-month period 0.85 pound volatile organic compounds (VOC)/hour; 0.57 ton VOC per rolling, 12-month period 0.03 pound particulate matter ≤ 10 microns in size (PM ₁₀)/hour; 0.02 ton PM ₁₀ per rolling, 12-month period 0.02 pound sulfur dioxide (SO ₂)/hour; 0.02 ton SO ₂ per rolling, 12-month period See b)(2)a. and c)(1).
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(5)(a)	0.310 pound PE/mmBtu
d.	OAC rule 3745-17-07(A)	Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		pursuant to OAC rule 3745-18-06(B).

(2) Additional Terms and Conditions

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

- i. 24.78 pounds CO/hour;
- ii. 2.48 pounds NOx/hour;
- iii. 0.85 pound VOC/hour;
- iv. 0.03 pound PM₁₀/hour;
- v. 0.02 pound SO₂/hour;
- vi. 16.73 tons CO per rolling, 12-month period;
- vii. 1.68 tons NOx per rolling, 12-month period;
- viii. 0.57 ton VOC per rolling, 12-month period;
- ix. 0.02 ton PM₁₀per rolling, 12-month period; and
- x. 0.02 ton SO₂ per rolling, 12-month period.

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

c) Operational Restrictions

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

a. The maximum, annual benzene fuel usage rate in this emissions unit shall not exceed 3,000 gallons per year, based upon a rolling, 12-month summation of the monthly fuel usage rates.

[OAC rule 3745-77-07(A)(1) and PTI #P0115617]

(2) The permittee shall only combust fuels in this emissions unit that are equivalent to, or more clean burning than, benzene fuel as stated in the permit application.



[OAC rule 3745-77-07(A)(1)and PTI #P0115617]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the fuel usage, in gallons/month; and
 - b. the rolling, 12-month summation of the fuel usage, in gallons.

[OAC rule 3745-77-07(C)(1)and PTI #P0115617]

- (2) For each day during which the permittee burns a fuel other than the fuel(s) identified in c)(2), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1)and PTI #P0115617]

- (3) The permit to install for this emissions unit was evaluated based on information contained in the permit to install application. Prior to any physical change or change in the method of operation involving the spark plug rating test cell, the permittee shall conduct an evaluation to determine if the change would constitute a "modification" as defined in OAC rule 3745-31-01. If any physical change in, or change(s) in the method of operation is (are) defined as a modification, then the permittee shall obtain a final permit to install prior to performing such change. The permittee shall collect, record, and retain all evaluation information and the final determination when modification evaluations are performed.

[OAC rule 3745-77-07(C)(1)and PTI #P0115617]

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-15-03(A)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1)and PTI #P0115617]

- (3) The permittee shall submit written reports that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in



accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)and PTI #P0115617]

- (4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than the fuel(s) identified in c)(2) was/were burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)and PTI #P0115617]

f) Testing Requirements

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

a. Emission Limitations:

24.78 pounds CO/hour
2.48 pounds NOx/hour

Application Compliance Method:

The hourly emission limitations represent the potentials to emit of this emissions unit; therefore, hourly record keeping is not required. The potentials to emit were determined in accordance with the following calculation:

pound pollutant ⁽¹⁾ gallon	2.222 gallons ⁽²⁾ hour
--	--------------------------------------

Where:

- (1) Company supplied emission factors from stack testing performed 11/21/2012 for CO and 11/17/2004 for NOx:

11.15 pounds CO/gallon benzene; and
1.118 pounds NOx/gallon benzene.

- (2) Maximum hourly fuel usage rate, as supplied in the permit application.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and Method 10 (CO) and/or Method 7 (NOx) of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)and PTI #P0115617]

b. Emission Limitations:

0.85 pound VOC/hour
0.03 pound filterable PM₁₀/hour



0.02 pound SO₂/hour

Applicable Compliance Method:

The hourly emission limitations represent the potentials to emit of this emissions unit; therefore, hourly record keeping is not required. The potentials to emit were determined in accordance with the following calculation:

pound pollutant ⁽¹⁾	126,063 Btu ⁽²⁾	2.222 gallons ⁽³⁾	1 mmBtu ⁽⁴⁾
mmBtu	gallon	hour	1,000,000 Btu

Where:

(1) Emission factors from U.S. EPA AP-42, Chapter 3.3 (10/1996):

3.03 pounds VOC/mmBtu;
 0.10 pound filterable PM₁₀/mmBtu; and
 0.084 pound SO₂/mmBtu.

(2) Heat content of fuel.

(3) Maximum hourly fuel usage rate, as supplied in permit application.

(4) Conversion factor.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and Methods 18, 25, or 25A (VOC), and/or Method 6 (SO₂) of 40 CFR Part 60, Appendix A, and/or 40 CFR Part 51, Appendix M, Methods 201/201A (filterable PM₁₀).

[OAC rule 3745-77-07(C)(1)and PTI #P0115617]

c. Emission Limitations:

16.73 tons CO per rolling, 12-month period

1.68 tons NOx per rolling, 12-month period

Applicable Compliance Method:

The 12-month rolling emission limits were established based on the annual fuel usage restriction of 3,000 gallons per rolling, 12-month period and can be calculated, as follows:

pound pollutant ⁽¹⁾	3,000 gallons ⁽²⁾	1 ton ⁽³⁾
gallon	year	2,000 pounds

Where:

(1) Company supplied emission factors from stack testing performed 11/21/2012 for CO and 11/17/2004 for NOx:



11.15 pounds CO/gallon benzene; and
 1.118 pounds NOx/gallon benzene.

- (2) Restricted, annual fuel usage rate [see c)(1)].
- (3) Conversion factor.

Therefore, provided compliance is shown with the hourly limitations and the 12-month, rolling fuel usage restriction, compliance with the 12-month, rolling emission limitations shall also be demonstrated.

[OAC rule 3745-77-07(C)(1)and PTI #P0115617]

d. Emission Limitations:

0.57 ton VOC per rolling, 12-month period
 0.02 ton PM₁₀ per rolling, 12-month period
 0.02 ton SO₂ per rolling, 12-month period

Applicable Compliance Method:

The 12-month rolling emission limits were established based on the annual fuel usage restriction of 3,000 gallons per rolling, 12-month period and can be calculated, as follows:

lb pollutant ⁽¹⁾	126,063 Btu ⁽²⁾	3,000 gals ⁽³⁾	1 mmBtu ⁽⁴⁾	1 ton ⁽⁴⁾
mmBtu	gallon	year	1,000,000 Btu	2,000 lbs

Where:

- (1) Emission factors from U.S. EPA AP-42, Chapter 3.3 (10/1996):
 3.03 pounds VOC/mmBtu;
 0.10 pound filterable PM₁₀/mmBtu; and
 0.084 pound SO₂/mmBtu.
- (2) Heat content of fuel.
- (3) Restricted, annual fuel usage rate [see c)(1)].
- (4) Conversion factor.

Therefore, provided compliance is shown with the hourly limitations and the 12-month, rolling fuel usage restriction, compliance with the 12-month, rolling emission limitations shall also be demonstrated.

[OAC rule 3745-77-07(C)(1)and PTI #P0115617]

e. Emission Limitation:

0.310 pound PE/mmBtu



Applicable Compliance Method:

This emission limitation was established pursuant to OAC rule 3745-17-11(B). If required, compliance with the above emission limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(10)]

f. Emission Limitation:

Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

This emission limitation was established pursuant to OAC rule 3745-17-07(A). If required, compliance with the above emission limitation shall be determined in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

(2) Emission Testing Requirements

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

- a. The emission testing shall be conducted within 6 months prior to the permit expiration, and/or as otherwise required in accordance with applicable rules, policies, etc. (i.e.: Engineering Guide #16, OAC rule 3745-15-04, revised Area Source Rule, etc.). The testing time frame specified may be amended or waived for cause upon prior request of, and written approval of, the appropriate Ohio EPA District Office or local air agency.
- b. The emission test shall be conducted to demonstrate compliance with the allowable mass emission rates for CO and NOx.
- c. Methods 1 – 4 of 40 CFR Part 60, Appendix A and the following test method(s) from 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s):

<u>Pollutant</u>	<u>Test Method</u>
CO	Method 10
NOx	Method 7

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

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



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

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



3. P074, DYNO CELLS

Operations, Property and/or Equipment Description:

dynamometer spark plug testing engines.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) [PTI #P0114963, issued July 29, 2013]	216.25 pounds carbon monoxide (CO)/hour; 201.41 tons CO per rolling, 12-month period 10.48 pounds nitrogen oxides (NOx)/hour; 9.76 tons NOx per rolling, 12-month period 19.48 pounds volatile organic compounds (VOC)/hour; 18.14 tons VOC per rolling, 12-month period 0.64 pound filterable particulate matter ≤ 10 microns in size (PM ₁₀)/hour; 0.60 ton filterable PM ₁₀ per rolling, 12-month period 0.54 pound sulfur dioxide (SO ₂)/hour; 0.50 ton SO ₂ per rolling, 12-month period See b)(2)a. and c)(1).
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(5)(a)	0.310 pound PE/mmBtu
d.	OAC rule 3745-17-07(A)	Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		pursuant to OAC rule 3745-18-06(B).

(2) Additional Terms and Conditions

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

- i. 216.25 pounds CO/hour;
- ii. 10.48 pounds NOx/hour;
- iii. 19.48 pounds VOC/hour;
- iv. 0.64 pound filterable PM₁₀/hour;
- v. 0.54 pound SO₂/hour;
- vi. 201.41 tons CO per rolling, 12-month period;
- vii. 9.76 tons NOx per rolling, 12-month period;
- viii. 18.14 tons VOC per rolling, 12-month period;
- ix. 0.60 ton filterable PM₁₀per rolling, 12-month period; and
- x. 0.50 ton SO₂ per rolling, 12-month period.

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

c) Operational Restrictions

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

a. The maximum, annual gasoline usage rate in this emissions unit shall not exceed 95,000 gallons per year, based upon a rolling, 12-month summation of the monthly fuel usage rates.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the fuel usage rate, upon issuance of this permit.

[OAC rule 3745-77-07(A)(1) and PTI #P0114963]



- (2) The permittee shall only combust fuels in this emissions unit that are equivalent to, or more clean burning than, gasoline, as defined in OAC rule 3745-21-01.

[OAC rule 3745-77-07(A)(1)and PTI #P0114963]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the fuel usage, in gallons/month; and
- b. the rolling, 12-month summation of the fuel usage, in gallons.

[OAC rule 3745-77-07(C)(1)and PTI #P0114963]

- (2) For each day during which the permittee burns a fuel other than the fuel(s) identified in c)(2), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1)and PTI #P0114963]

- (3) The permit to install for this emissions unit was evaluated based on information contained in the permit to install application. Prior to any physical change or change in the method of operation involving the dynamometer spark plug testing engines, the permittee shall conduct an evaluation to determine if the change would constitute a "modification" as defined in OAC rule 3745-31-01. If any physical change in, or change(s) in the method of operation is (are) defined as a modification, then the permittee shall obtain a final permit to install prior to performing such change. The permittee shall collect, record, and retain all evaluation information and the final determination when modification evaluations are performed.

[OAC rule 3745-77-07(C)(1)and PTI #P0114963]

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-15-03(A)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviations from the federally and state-only enforceable emission limitations, operational restrictions, and control device operating parameter limitations, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall include (a) the probable cause of such deviations and (b) any corrective actions or preventative measures that have been or will be taken to eliminate the deviation(s).

[OAC rule 3745-77-07(C)(1)and PTI #P0114963]



- (3) The permittee shall submit written reports that identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements every six months, in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)and PTI #P0114963]

- (4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than the fuel(s) identified in c)(2) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)and PTI #P0114963]

f) Testing Requirements

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

a. Emission Limitations:

216.25 pounds CO/hour

Application Compliance Method:

The hourly emission limitation represents the potential to emit of this emissions unit; therefore, hourly record keeping is not required. The potential to emit was determined in accordance with the following calculation:

4.24 pounds CO ⁽¹⁾ gallon	51.0 gallons ⁽²⁾ hour
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Where:

(1) Company supplied emission factor from stack testing performed 1/10/2013.

(2) Maximum hourly fuel usage rate, as supplied in permit application.

Compliance with the hourly emission limitation for CO shall be based upon the results of emission testing conducted in accordance with the emission testing requirements specified in f)(2).

[OAC rule 3745-77-07(C)(1)and PTI #P0114963]

b. Emission Limitations:

10.48 pounds NOx/hour
 19.48 pounds VOC/hour
 0.64 pound filterable PM₁₀/hour
 0.54 pound SO₂/hour



Applicable Compliance Method:

The hourly emission limitations represent the potentials to emit of this emissions unit; therefore, hourly record keeping is not required. The potentials to emit were determined in accordance with the following calculation:

pound pollutant ⁽¹⁾	126,063 Btu ⁽²⁾	51.0 gallons ⁽³⁾	1 mmBtu ⁽⁴⁾
mmBtu	gallon	hour	1,000,000 Btu

Where:

(1) Emission factors from U.S. EPA AP-42, Chapter 3.3 (10/1996):

- 1.63 pounds NO_x/mmBtu;
- 3.03 pounds VOC/mmBtu;
- 0.10 pound filterable PM₁₀/mmBtu; and
- 0.084 pound SO₂/mmBtu.

(2) Heat content of fuel.

(3) Maximum hourly fuel usage rate, as supplied in permit application.

(4) Conversion factor.

Compliance with the hourly emission limitations for NO_x and VOC shall be based upon the results of emission testing conducted in accordance with the emission testing requirements specified in f)(2).

If required, the permittee shall demonstrate compliance with the hourly emission limitations for PM₁₀ and SO₂ by testing in accordance with Methods 1 – 4 and Method 6 (SO₂) of 40 CFR Part 60, Appendix A and/or 40 CFR Part 51, Appendix M, Methods 201/201A (filterable PM₁₀).

[OAC rule 3745-77-07(C)(1)and PTI #P0114963]

c. Emission Limitations:

201.41 tons CO per rolling, 12-month period

Applicable Compliance Method:

The 12-month rolling emission limits were established based on the annual fuel usage restriction of 95,000 gallons per rolling, 12-month period. The annual emission restrictions can be calculated, as follows:

4.24 pound CO ⁽¹⁾	95,000 gallons ⁽²⁾	1 ton ⁽³⁾
gallon	year	2,000 pounds



Where:

- (1) Company supplied emission factors from stack testing performed 1/10/2013.
- (2) Restricted, annual fuel usage rate [see c)(1)].
- (3) Conversion factor.

Therefore, provided compliance is shown with the hourly limitations and the 12-month, rolling fuel usage restriction, compliance with the annual emission limitations shall also be demonstrated.

[OAC rule 3745-77-07(C)(1)and PTI #P0114963]

d. Emission Limitations:

- 9.76 tons NOx per rolling, 12-month period
- 18.14 tons VOC per rolling, 12-month period
- 0.60 ton filterable PM₁₀ per rolling, 12-month period
- 0.50 ton SO₂ per rolling, 12-month period

Applicable Compliance Method:

The 12-month rolling emission limits were established based on the annual fuel usage restriction of 95,000 gallons per rolling, 12-month period. The annual emission restrictions can be calculated, as follows:

lb pollutant ⁽¹⁾	126,063 Btu ⁽²⁾	95,000 gals ⁽³⁾	1 mmBtu ⁽⁴⁾	1 ton ⁽⁴⁾
mmBtu	gallon	year	1,000,000 Btu	2,000 lbs

Where:

- (1) Emission factors from U.S. EPA AP-42, Chapter 3.3 (10/1996):
 - 1.63 pounds NOx/mmBtu;
 - 3.03 pounds VOC/mmBtu;
 - 0.10 pound filterable PM₁₀/mmBtu; and
 - 0.084 pound SO₂/mmBtu.
- (2) Heat content of fuel.
- (3) Restricted, annual fuel usage rate [see c)(1)].
- (4) Conversion factors.

Therefore, provided compliance is shown with the hourly limitations and the 12-month, rolling fuel usage restriction, compliance with the annual emission limitations shall also be demonstrated.

[OAC rule 3745-77-07(C)(1)and PTI #P0114963]



e. Emission Limitation:

0.310 pound PE/mmBtu

Applicable Compliance Method:

This emission limitation was established pursuant to OAC rule 3745-17-11(B). If required, compliance with the above emission limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(10)]

f. Emission Limitation:

Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

This emission limitation was established pursuant to OAC rule 3745-17-07(A). If required, compliance with the above emission limitation shall be determined in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

(2) Emission Testing Requirements

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

- a. The emission testing shall be conducted approximately 2.5 years after the effective date for the Title V permit and within 6 months prior to the permit expiration, and/or as otherwise required in accordance with applicable rules, policies, etc. (i.e.: Engineering Guide #16, OAC rule 3745-15-04, revised Area Source Rule, etc.). The testing time frame specified may be amended or waived for cause upon prior request of, and written approval of, the appropriate Ohio EPA District Office or local air agency.
- b. The emission test approximately 2.5 years after the effective date of the Title V permit shall be conducted to demonstrate compliance with the allowable mass emission rate for CO only. The emission test within 6 months prior to the permit expiration shall be conducted to demonstrate compliance with the allowable mass emission rates for NO_x, CO, and VOC.
- c. Methods 1 – 4 of 40 CFR Part 60, Appendix A and the following test method(s) from 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s):



<u>Pollutant</u>	<u>Test Method</u>
NOx	Method 7
CO	Method 10
VOC	Method 18, 25, or 25A

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

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

- g) Miscellaneous Requirements
 - (1) None.