



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

07/29/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

**P001 (Mandrel Dissolving) Steel Mandrel Dissolving and
Cleaning**

GE Lighting Inc (02-50-00-0065)
Gerald Bobbs
280 N. Meridian Rd.
Youngstown, OH 44509

Dear Gerald Bobbs:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

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

cc: Northeast District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 07/29/03

Expiration Date: 07/29/08

This document constitutes issuance to:

Facility ID: 02-50-00-0065
GE Lighting Inc
2180 N. Meridian Rd
Youngstown, OH 44509

of a permit to operate for:

P001 (Mandrel Dissolving)
Steel Mandrel Dissolving and Cleaning

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in black ink, appearing to read "Christopher Jones", written over a horizontal line.

Christopher Jones
Director

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. 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.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. 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 and federal 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.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Steel mandrel dissolving operations with wet scrubber	OAC rule 3745-35-07	HCl: 2.2 pounds per hour and 9.64 tons per year.
	OAC rule 3745-21-07(G)(2)	See A.2.a. See A.2.b.

2. Additional Terms and Conditions

- An emission test was conducted on July 21, 1998 for this emissions unit. The results of the test indicated compliance with the emission limit of 2.2 pounds per hour of HCl. The average of the three test runs indicated an average emission rate for HCl of 0.93 pound per hour. The 9.64 tons per year limitation is the potential to emit for this emissions unit at an hourly emission rate of 2.2 pounds per hour and 8,760 hours of operation.
- This emissions unit shall not employ any liquid organic materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

- The pH of the packed tower scrubber liquid shall be maintained at greater than 6.0 during all production periods, except during those periods .
- The liquid flow rate through the packed tower scrubber shall be maintained at greater than 70 gallons per minute during all production periods.

C. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to continuously monitor and record the pH of the packed scrubber liquid while the emissions unit is in operation. The pH monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, specifications, instructions and/or operating manuals.

The permittee shall record the pH of the packed tower scrubber liquid at a minimum of once per hour during operation of this emissions unit.

- The permittee shall properly operate and maintain equipment to continuously monitor the liquid flow rate through the packed tower scrubber while the emissions unit is in operation. The flow monitor shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, specifications, instructions and/or operating manuals, if any.

The permittee shall record the liquid flow rate through the packed tower scrubber at a minimum of once per day during operation of this emissions unit.

- The permittee shall maintain a log or record of the operating hours for the collection system, control device, monitoring equipment, and the associated emissions unit.
- The permittee shall maintain daily records of the hours of operation of this emissions unit.

C. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall keep the following records for each material used in this emissions unit:
 - a. The identification of the chemical compound and its physical state.
 - b. For each liquid organic material, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the packed tower scrubber liquid pH did not comply with the requirement specified above in section B.1.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the packed tower scrubber liquid flow rate did not comply with the requirement specified above in section B.2.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which any photochemically reactive materials were employed.

E. Testing Requirements

1. Emissions Limitation:
2.2 pounds per hour of HCl

Applicable Compliance Method:
Compliance with the HCl emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 26.
2. Emissions Limitation:
9.64 tons per year of HCl

Applicable Compliance Method:
Compliance shall be determined by use of the following equation:

$$E = (\text{number of operating hours per year for the emissions unit}) * (\text{mass emissions rate for HCl as determined from the most recent compliance test}) * (1 \text{ ton}/2000 \text{ pounds})$$
3. Emission testing requirements

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 3.a The emission testing shall be conducted approximately 2.5 years after the issuance of this permit and within 6 months prior to permit expiration.
 - 3.b The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for HCl.
 - 3.c The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 26. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - 3.d The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
4. 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).
5. 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.

E. Testing Requirements (continued)

6. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test(s) 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.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, only the following terms and conditions of Part II of this permit to operate are federally enforceable: A - F.