**John R. Kasich**, Governor
**Mary Taylor**, Lt. Governor
**Craig W. Butler**, Director

4/7/2014

Certified Mail

Ron Grannan
Industrial Container Services - OH, LLC
1385 Blatt Blvd
Gahanna, OH 43230

Facility ID: 0125070213
Permit Number: P0083383
County: Franklin

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 Columbus Dispatch. 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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

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, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-CDO

PUBLIC NOTICE
4/7/2014 Issuance of Draft Air Pollution Title V Permit

Industrial Container Services - OH, LLC
1385 Blatt Boulevard, Gahanna Industrial Park
Gahanna, OH 43230
Franklin County
FACILITY DESC.: Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance
PERMIT #: P0083383
PERMIT TYPE: Renewal
PERMIT DESC: Title V Renewal Permit for a drum reconditioning facility consisting of coating operations controlled by a RTO/PTE, caustic wash operations controlled by a RTO, drum reclamation furnace controlled by a TO and shot blasting operations controlled by baghouses.

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: Todd Scarborough, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778

# Statement of Basis For Air Pollution Title V Permit

| | |
|---|---|
| Facility ID: | 0125070213 |
| Facility Name: | Industrial Container Services - OH, LLC |
| Facility Description: | Drum Reconditioning Facility |
| Facility Address: | 1385 Blatt Boulevard, Gahanna, OH 43230 |
| Permit #: | P0083383/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) | 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 that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3) | 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 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) | Permits to Install (PTIs) issued since the Title V: PTI# 01-01289, issued on 5/6/2006, resolved the noncompliance issues concerning K001, K002, and K003 since the initial Title V permit was issued. PTI# P01070000 was issued on 4/11/2011 and covered the caustic wash operation. Enforcement Actions: Consent Order filed 7/6/2005 with the Franklin County (Ohio) Municipal Court Environmental Division required the company to submit complete PTI applications for K001, K002, K003, P015 and P016. The consent order also served as the vehicle to correct testing, monitoring, recordkeeping and reporting deficiencies of the emission units at the facility. The facility has complied with the requirements of the consent order, and there were civil and stipulated penalties assessed. Shut Down Emission Units: Emission units P014 and P015 were shut down on 5/31/2012. P016 was shut down on 5/6/2011. Emission Units Installed: P019 was installed on 2/1/2013 (P0107000) and commenced operation on 5/6/2013. |
| 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. | N/A |

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

| Term and Condition (paragraph) | Basis | | Comments |
|---|---|---|---|
| | SIP (3745- ) | Other | |
| | | | All emission units have satisfied all testing requirements of the expired (first issue) Title V permit. All emission units have satisfied all testing requirements of the PTIs issued. All emission units have passed their most recent emissions tests. Testing for K001, K002, and K003 was conducted on 12/11/2013. Testing for N002 was conducted on 12/21/2006. Testing for P019 was conducted on 12/11/2013. Testing for P001, P005, P012 and P013 was conducted on 7/6/2005. Testing for P015 and P016 was conducted on 6/23/2005(however as stated, these EUs are shut down). For the complete history of facility emissions testing please see the attachments section in the permit detail page. |
| | | | |

## 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 | | | | | | | | | | |
| K001 | 4.3 lbs VOC/ gallon of coating, minus water and exempt solvents | 21-09(U)(1)(e) | | N | N | N | N | Y | N | N | Y | Y | M: No monitoring requirements are necessary to show compliance.<br>T: No testing requirements are necessary to show compliance. |
| K002 | 3.5 lbs VOC/ gallon of coating, minus water and exempt solvents | 21-09(U)(1)(f) | | N | N | N | N | Y | N | N | Y | Y | M: No monitoring requirements are necessary to show compliance.<br>T: No testing requirements are necessary to show compliance. |
| K003 | 3.5 lbs VOC/ gallon of coating, minus water and exempt solvents | 21-09(U)(1)(f) | | N | N | N | N | Y | Y | N | N | N | M: No monitoring requirements are necessary to show compliance.<br>T: No testing requirements are necessary to show compliance. |
| K003 | 4.3 lbs VOC/ gallon of coating, minus water and exempt solvents | 21-09(U)(1)(e) | | N | N | N | N | Y | Y | N | N | N | M: No monitoring requirements are necessary to show compliance.<br>T: No testing requirements are necessary to show compliance. |
| K001-K003 | Opacity shall not exeeed 20% as a six minute average except as provided by | 17-07(A) | | N | Y | N | N | N | N | N | N | N | OR- Usage of the appropriate control system is required<br>M: No monitoring requirements are necessary to show compliance.<br>R: No record keeping requirements are necessary to show compliance.<br>Rp: No reporting requirements are necessary to show |

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| | rule | | | | | | | | | | | | compliance.<br>T: No testing requirements are necessary to show compliance. |
| P001, P005, P010&P013 | Opacity shall not exeeed 20% as a six minute average except as provided by rule | 17-07(A) | | N | Y | Y | N | Y | Y | N | N | N | OR- Usage of the appropriate control system is required<br>T: No testing requirements are necessary to show compliance. |
| N002 | 9.0 lbs OC/hr | 31-05(A)(3)<br><br>(PTI # 01-6852) | | Y | Y | Y | N | Y | Y | Y | N | N | OR- Required to maintain a minimum temperature for the thermal oxidizer. |
| N002 | 50 ppmv CO on an hourly average basis | 31-05(A)(3)<br><br>(PTI # 01-6852) | | N | Y | Y | N | Y | Y | Y | N | N | |
| N002 | Opacity shall not exeeed 5% as a six minute average except as provided by rule | 31-05(A)(3)<br><br>(PTI # 01-6852) | | N | N | N | N | N | N | N | N | N | M: No monitoring requirements are necessary to show compliance.<br>R: No record keeping requirements are necessary to show compliance.<br>Rp: No reporting requirements are necessary to show compliance.<br>T: No testing requirements are necessary to show compliance. |
| N002 | 10.5 lbsNOx/hr& 29.2 tons NOx/yr | 31-05(A)(3)<br><br>(PTI # 01-6852) | | N | N | N | N | N | N | Y | N | N | M: No monitoring requirements are necessary to show compliance.<br>R: No record keeping requirements are necessary to show compliance.<br>Rp: No reporting requirements are necessary to show compliance. |
| N002 | 2.97 lbs CO/hr& 8.25 tons CO/yr | 31-05(A)(3)<br><br>(PTI # 01-6852) | | N | N | N | N | N | N | Y | N | N | M: No monitoring requirements are necessary to show compliance.<br>R: No record keeping requirements are necessary to show compliance.<br>Rp: No reporting requirements are necessary to show compliance. |

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| N002 | 3.9 lbs SO2/hr& 16.9 tons SO2/yr | 31-05(A)(3)<br><br>(PTI # 01-6852) | | N | N | N | N | N | N | N | N | N | M: No monitoring requirements are necessary to show compliance.<br>R: No record keeping requirements are necessary to show compliance.<br>Rp: No reporting requirements are necessary to show compliance.<br>T: If required, facility will conduct emissions testing using USEPA approved methodology. |
| N002 | 4.4 lb PM10/hr | 31-05(A)(3)<br><br>(PTI # 01-6852) | | N | N | N | N | N | N | N | N | N | M: No monitoring requirements are necessary to show compliance.<br>R: No record keeping requirements are necessary to show compliance.<br>Rp: No reporting requirements are necessary to show compliance.<br>ET: If required, facility will conduct emissions testing using USEPA approved methodology. |
| N002 | 0.0042 lb As/hr& 0.0091 ton As/yr<br><br>0.0005 lb Be/hr& 0.0011 ton Be/yr<br><br>0.010 lb Cd/hr& 0.022 ton Cd/yr<br><br>0.004 lb Cr/hr& 0.0076 ton Cr/yr<br><br>0.052 lbPb/hr& 0.11 ton Pb/yr<br><br>0.005 lb Hg/hr& 0.011 ton | 31-05(A)(3)<br><br>(PTI # 01-6852) | | N | N | N | N | N | N | Y | N | N | M: No monitoring requirements are necessary to show compliance.<br>R: No record keeping requirements are necessary to show compliance.<br>Rp: No reporting requirements are necessary to show compliance. |

| | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Hg/yr<br><br>0.0076 lb Ni/hr& 0.02 ton Hg/yr | | | | | | | | | | | | |
| N002 | 95% overall control | 31-05(A)(3)<br><br>(PTI # 01-6852) | | Y | Y | Y | N | Y | Y | Y | N | N | OR- Required to maintain the PTE as a PTE and operate the thermal oxidizer at a minimum temperature. |
| N002 | 95% DRE | 31-05(A)(3)<br><br>(PTI # 01-6852) | | Y | Y | Y | N | Y | Y | Y | N | N | OR- Required to maintain a minimum temperature for the thermal oxidizer. |
| N002 | 0.1 lb PM/ 100 lbs of salvageable material | 17-09 | | N | N | N | N | N | N | Y | N | N | M: No monitoring requirements are necessary to show compliance.<br>R: No record keeping requirements are necessary to show compliance.<br>Rp: No reporting requirements are necessary to show compliance. |
| P001 | 3.38 lbs PE/hr | 17-11(B)(1)<br><br>table I | | N | Y | Y | N | Y | Y | Y | N | N | OR- Required to maintain the pressure drop across the baghouse at a minimum pressure. |
| P005 | 19.69 lbs PE/hr | 17-11(B)(1)<br><br>table I | | N | Y | Y | N | Y | Y | Y | N | N | OR- Required to maintain the pressure drop across the baghouse at a minimum pressure. |
| P012 | 1.45 lbs PE/hr& 0.01 gr.dscf | 31-05(A)(3)<br><br>(PTI # 01-3786) | | N | Y | Y | N | Y | Y | Y | N | N | OR- Required to maintain the pressure drop across the baghouse at a minimum pressure. |
| P013 | 2.25 lbs PE/hr& 0.015 gr.dscf | 31-05(A)(3)<br><br>(PTI # 01-3786) | | N | Y | Y | N | Y | Y | Y | N | N | OR- Required to maintain the pressure drop across the baghouse at a minimum pressure. |
| P017 | 0.50 lbs VOC/hr& 2.19 Tons VOC/yr | 31-05(A)(3)<br><br>(PTI #P0107000) | | N | Y | Y | N | Y | Y | N | N | N | OR- Required to operate the thermal oxidizer at a minimum temperature. |

| | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P017&P019 | 0.551lb PE/hr | 17-11 | | N | Y | Y | N | Y | Y | N | N | N | ET: If required, facility will conduct emissions testing using USEPA approved methodology.<br><br>OR- Required to maintain the pressure drop across the scrubber at a minimum pressure. |
| P019 | 01.43 lbs VOC/hr& 6.26 Tons VOC/yr | 31-05(A)(3)<br><br>(PTI #P0107000) | | N | Y | Y | N | Y | Y | Y | N | N | OR- Required to operate the thermal oxidizer at a minimum temperature. |

# DRAFT

# Division of Air Pollution Control
# Title V Permit
for
Industrial Container Services - OH, LLC

| | |
|---|---|
| Facility ID: | 0125070213 |
| Permit Number: | P0083383 |
| Permit Type: | Renewal |
| Issued: | 4/7/2014 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

**Division of Air Pollution Control**
**Title V Permit**
for
Industrial Container Services - OH, LLC

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# Authorization

| | |
|---|---|
| Facility ID: | 0125070213 |
| Facility Description: | Repair shops and related services, n.e.c. |
| Application Number(s): | A0013755, A0042278, A0045964 |
| Permit Number: | P0083383 |
| Permit Description: | Title V Renewal Permit for a drum reconditioning facility consisting of coating operations controlled by a RTO/PTE, caustic wash operations controlled by a RTO, drum reclamation furnace controlled by a TO and shot blasting operations controlled by baghouses. |
| Permit Type: | Renewal |
| Issue Date: | 4/7/2014 |
| Effective Date: | To be entered upon final issuance |
| Expiration Date: | To be entered upon final issuance |
| Superseded Permit Number: | P0083382 |

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

Industrial Container Services - OH, LLC
1385 Blatt Boulevard
Gahanna Industrial Park
Gahanna, OH 43230

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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, Central 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

Craig W. Butler
Director

# 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 recordingsfor 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 submittedscheduled 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, Central 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, Central 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, Central 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 permitexcept 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

Officialthat, 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, Central 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, Central 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 intermittentconsistent 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, Central 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, Central 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, noemissions unit identified in this permit that has beencertified 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 RequirementsUnder 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 theOhio EPA DAPC, Central 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, Central 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 RequirementsUnder 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, Central 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, Central 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 ofan 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, Central 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.

# 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.

1. 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, and 3745-21, and/or 40 CFR Part 60 or 63:

   B003–Air make Up Unit #1

   B004–Air make Up Unit #2

   B005 – Air make Up Unit #3

   B006 – Air make Up Unit #4 [PTI 01-3692 issued June 30, 1992]

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

# C. Emissions Unit Terms and Conditions

## 1. K001, Interior Drum Lining

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

Interior drum coating paint booths and drying oven.

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)<br>(PTI # 01-01289) | Volatile Organic Compound(VOC) emissions from linings shall not exceed 1.75pounds per hour and 7.67tons per year.<br><br>Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour and 3.5 tons per year.<br><br>See b)(2)a-e below.<br><br>Emissions from natural gas usage in the incinerator and associated oven shall not exceed:<br><br>1.176 lbsNOx/hr;<br>5.15 tons NOx/yr;<br>0.007 lb SO2/hr;<br>0.031 ton SO2/yr;<br>0.988 lb CO/hr;<br>4.33 tons CO/yr;<br>0.09 lb PM/hr;<br>0.39 ton PM/yr;<br>0.0647 lb VOC/hr; and<br>0.28 ton VOC/yr<br><br>Particulate emissions from linings shall |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | not exceed 3.07 tons per year.<br><br>Visible particulate matter (PM) emissions shall not exceed 5% opacity.<br><br>Compliance with this rule also includes compliance with the requirements of 40 CFR 63 subpart MMMM and OAC rule 3745-17-11(B)(1). |
| b. | OAC rule 3745-17-07(A)(1) | The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-11(C) | The requirements specified in this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3). |
| d. | OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6) | The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3). |
| e. | 40 CFR 63 subpart MMMM | See b)(2)f-i. |

(2) Additional Terms and Conditions

a. The permittee shall operate the particulate filtration system whenever this emissions unit is in operation.

b. The Permanent Total Enclosure (PTE) serving this emissions unit shall be installed and constructed in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) .

c. The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

d. The VOC content of each lining, as applied, shall not exceed 4.3 pounds of VOC per gallon, minus water and exempt solvents

e. The VOC content of the clean up material, as applied, shall not exceed 6.71 pounds of VOC per gallon, minus water and exempt solvents

f. This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR 63. The

application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

g. This emissions unit is subject to applicable sections of 40 CFR Part 63, Subpart A as denoted in 40 CFR Part 63, Subpart MMMM, Table 1.

h. The permittee has chosen to comply with the "Add on Controls Option" available in Subpart MMMM: 63.3891(c). This option has operational restrictions, work practice requirements and monitoring and record keeping requirements.

i. In accordance with 40 CFR 63.3890(b)(1), the organic HAP emissions shall not exceed 2.6 pounds of organic HAP per gallon of solids during each 12 month compliance period. The Organic HAP emission rate shall be as a rolling 12-month emission rate and determined on a monthly basis.

j. The hourly and annual emission limitations from natural gas combustion in the oven and in the Regenerative Thermal Oxidizer were established to reflect the potential to emit from the combustion of natural gas for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations specific to the combustion of natural gas.

c) Operational Restrictions

(1) The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the combustion chamber of the thermal incinerator, for any successive 3-hour period of time, shall not be below the average temperature observed during the most recent emission test that demonstrated the emissions unit was in compliance. The combustion temperature of the Regenerative Thermal Oxidizer and the average temperature of the combustion chamber of the Regenerative Thermal Oxidizer shall be measured at the same location.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI # 01-01289]

(2) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emission unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI # 01-01289]

(3) Each lining employed in this emissions unit shall comply with the VOC content limitation specified in Section d)(2) on an "as applied" basis.

[Authority for Term: OAC rule 3745-77-07(A)(1),PTI # 01-01289]

(4) In accordance with 40 CFR 63.3893(b), the permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and

conveying of coatings, thinners and /or other additives, and cleaning materials used in and waste materials generated by the coating operation.

[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR 63.3893(b), PTI # 01-01289]

(5) In accordance with 40 CFR 63.3900 , the permittee shall comply with the develop and implement a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3).

[Authority for Term: OAC rule 3745-77-07(A)(1),40 CFR 63.3900, 40 CFR 63.6(e)(3), PTI # 01-01289]

(6) In accordance with 40 CFR 63.3892(b), the permittee shall comply with the operating limits specified in Table 1 of subpart MMMM.

[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR 63.3892(b),PTI # 01-01289]

(7) The exit of the stack serving this emissions unit shall be a minimum of 50 feet above ground.

[Authority for Term: OAC rule 3745-77-07(A)(1),PTI # 01-01289]

(8) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filterin accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-17-11(C)(1) , OAC rule 3745-17-11 (2)(b) and OAC rule 3745-77-07(C)(1)]

(9) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the Regenerative Thermal Oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(2) For each day this emissions unit operates, the permittee shall collect and record the following information for this emissions unit:

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

b. the VOC content of each lining, as applied, in pounds per gallon;

c. the number of gallons of each lining employed;

d. the total number of hours the emissions unit was operated;

e. the total uncontrolled VOC emission rate from all linings , in pounds ([the summation of d)(2)b X d)(2)c for each lining] ;

f. the calculated, controlled VOC emission rate for all linings in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and

g. the average hourly controlled VOC emission rate, in pounds per hour, i.e., d)(2)f/d)(2)d. This calculation shall be performed within 7 days of the date this emissions unit operated.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(3) The permittee shall maintain and operate monitoring device(s) and a recorder which continuously measure and record the pressure differential from outside to inside the permanent total enclosure. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software. The monitoring and recording device(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(4) The permittee shall collect and record the following information for each operating day:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

b. all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was below the average temperature observed during the most recent emission test that demonstrated that the emissions unit was in compliance;

c. prior to the initial compliance demonstration, all successive 3-hour periods of time during which the average combustion temperature within the Regenerative

Thermal Oxidizer, when the emissions unit was in operation, was less than 1400 degrees; and

d. all rolling, 1-hour blocks of time during which the average pressure differential between the permanent total enclosure and the outside area(s), when the emissions unit was in operation, was less than 0.007 inch of water column.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(5) For each lining, the permittee shall receive a USEPA Method 24 analysis with each shipment from the lining supplier. The analysis shall identify the name and address of the supplier, the supplier's coating identification number, and the following information:

a. date of shipment or delivery;

b. quantity of lining received, in gallons;

c. ICS's lining identification number;

d. the VOC content of each lining, in pounds per gallon, excluding water and exempt solvents.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(6) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(7) The permittee shall maintain a copy of each notification and report submitted to comply with the requirements of 40 CFR Part 63, Subpart MMMM.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(8) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.

[OAC 3745-17-11(C)(2)(a)]

(9) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(c)]

(10) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

(11) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA,Central District Office upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

(12) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(e),(f), and (g)], for [OAC rule 3745-17-11(C)(1)]

(13) In accordance with 40 CFR 62.3968, the permittee shall comply the capture and control system requirements for continuous parameter monitoring system installation, operation, and maintenance.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 62.3968, PTI # 01-01289]

(14) The permittee shall maintain the records required by 40 CFR 63.3930.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 63.3930, PTI # 01-01289]

(15) This facility shall maintain daily records which list the following information for the combined cleanup material employed in emissions units K001 through K003

a. the name and identification of each cleanup material;

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

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

d. the total VOC emissions from all cleanup material employed, prior to any credit forrecovered materials, in pounds i.e., the summation of the products of the

amounts (c) of all cleanup materials applied (a) in emissions units K001 through K003, above, times each material's VOC content (b).

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(16) If a credit for recovered materials is used to demonstrate compliance, the permittee shall maintain the following records for the recovered cleanup materials and the recovery tank serving the emissions units K001 through K003.

a. the date the recovery tank was emptied;

b. the date the materials from the recovery tank were shipped off site;

c. the number of gallons of materials from the recovery tank shipped off site;

d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

e. the total VOC emissions (in pounds ) from recovered cleanup materials , to be credited against the total VOC emissions from all cleanup materials applied in emissions units K001 through K003.

f. the average hourly VOC emission rate, in pounds per hour, i.e., d)(2)d/( d)(15)d – d)(16)e)

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which include the following information:

a. any record of a pressure differential deviation (excursion) report that identifies all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water, when the emissions unit was in operation;

b. an identification of each day, during which the average hourly VOC emissions from all linings used in the source exceeded 1.75 pounds per hour, and the actual average hourly VOC emissions for each such day;

c. an identification of all successive 3-hour periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed; and

d. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

e. an identification of each day, during which the average hourly VOC emissions from all cleanup materials used in emissions units K001 through K003 exceeded 6.71 pounds per hour, and the actual average hourly VOC emissions for each such day;

f. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(2) The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

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

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(4) The permittee shall submit deviation (excursion) reports that identify all exceedances of the lining and clean up material VOC content limitations. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(5) The permittee shall submit a notification of compliance status in accordance with 40 CFR 63.3910(c).

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 63.3910(c), PTI # 01-01289]

(6) The permittee shall submit an initial notification report as required by 40 CFR 63.9(b)(2) of subpart A and shall be submitted by the dates specified by 40 CFR 63.9(b)(2) of subpart A.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 63.9(b)(2), 40 CFR 63.9(b)(2), PTI # 01-01289]

(7) The permittee shall submit semi annual reports in accordance with 40 CFR 63.3920.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 63.3920, PTI # 01-01289]

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: The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

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

i. The emission testing shall be conducted approximately 2 and a half years after issuance of this permit and within 6 months prior to permit expiration.

ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

iii. The test(s) shall be conducted while this emissions unit, K002 and K003 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA 's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section f)1.a.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

b. Not later than 30 days prior to the proposed test date(s) , the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

c. Personnel from the Ohio EPA, Central District Office 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.

d. 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 Ohio EPA, Central District Office within 30 days following completion of the test(s).

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 51, Appendix M, 40 CFR Part 60, Appendix A, OAC rule 3745-21-10, PTI # 01-01289]

(2) Emission Limitation: Visible particulate emissions from the stack shall not exceed 5% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A, OAC rule 3745-17-03(B)(1), PTI # 01-01289]

(3) Emission Limitation:The VOC content of each lining, as applied, shall not exceed 4.3 pounds of VOC per gallon, minus water and exempt solvents

Applicable Compliance Method: USEPA Method 24 shall be used to determine the VOC contents for the linings. If an owner or operator determines that Method 24 cannot be used for a particular lining, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that lining to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A,PTI # 01-01289]

(4) Emission Limitation:Emissions from natural gas usage in the incinerator and associated oven shall not exceed 1.176 lbs of NOx/hr. Compliance

Applicable Compliance Method: Compliance with the allowable mass emission rate for NOx emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 100 lb of NOx/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and the associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A, PTI # 01-01289]

(5) Emission Limitation:Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.988 lb of CO/hr .

Applicable Compliance Method:Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 84 lb of CO/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and the associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A, PTI # 01-01289]

(6) Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.007 lb of SO2/hr .

Applicable Compliance Method: Compliance with the allowable mass emission rate for SO2 emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 0.6 lb of SO2/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and the associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A, PTI # 01-01289]

(7) Emission Limitation:Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.0647 lb of VOC/hr .

Applicable Compliance Method:Compliance with the allowable mass emission rate for VOC emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 5.5 lb of VOC/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and the associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, PTI # 01-01289]

(8) Emission Limitation:Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.09 lb of PM/hr.

Applicable Compliance Method: Compliance with the allowable mass emission rate for particulate emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 7.6lb of PM/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and the associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, PTI # 01-01289]

(9) Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.39 ton of PM/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.031 ton of SO2/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.28 ton of VOC/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 5.15 tons of NOx/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 4.33 tons of CO/yr.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying thehourly limitation by 8760, and then dividing by 2000).

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A, PTI # 01-01289]

(10) Emission Limitation: Volatile Organic Compound(VOC) emissions from linings shall not exceed 1.75 pounds per hour .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section d).2.g .

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(11) Emission Limitation: Volatile Organic Compound(VOC) emissions from linings shall not exceed 7.67 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(12) Emission Limitation: Particulate emissions from coatings shall not exceed 3.07 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(13) Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour.

Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section d)(16).f.

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(14) Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 3.5 tons per year.

Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Sections d)(15).d and d)(16).e.

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(15) Emission Limitation:The VOC content of the clean up material, as applied, shall not exceed 6.71 pounds of VOC per gallon, minus water and exempt solvents

Applicable Compliance Method: USEPA Method 24 shall be used to determine the VOC contents for the cleanup materials recovered. If an owner or operator determines that Method 24 cannot be used for a particular lining, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that lining to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix APTI # 01-01289]

g) Miscellaneous Requirements

(1) None.

## 2. K002, Exterior Drum Painting

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

Exterior drum coating paint booth and drying oven.

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)<br>(PTI # 01-01289) | Volatile Organic Compound(VOC) emissions from coatings shall not exceed 2.85 pounds per hour and 12.48tons per year.<br><br>Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour and 3.5 tons per year.<br><br>See b)(2)a-e below.<br><br>Emissions from natural gas usage in the incinerator and the associated oven shall not exceed:<br><br>1.15 lbNOx/hr;<br>5.04 tons NOx/yr;<br>0.007 lb SO2/hr;<br>0.03 ton SO2/yr;<br>0.966 lb CO/hr;<br>4.23 tons CO/yr;<br>0.087 lb PM/hr;<br>0.38 ton PM/yr;<br>0.063 lb VOC/hr; and<br>0.28 ton VOC/yr.<br><br>Visible particulate matter (PM) emissions |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | shall not exceed 5% opacity.<br><br>Particulate emissions from coatings shall not exceed 5.52 tons per year.<br><br>Compliance with this rule also includes compliance with the requirements of 40 CFR 63 subpart MMMM and OAC rule 3745-17-11(B)(1).<br><br>The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).<br><br>Particulate emissions shall not exceed 1.26 pounds per hour.<br><br>The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).<br><br>See b)(2)f-i. |
| b. | OAC rule 3745-17-07(A)(1) | The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-11(C) | The requirements specified in this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3). |
| d. | OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6) | The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3). |
| e. | 40 CFR 63 subpart MMMM | See b)(.2)f-i. |

(2) Additional Terms and Conditions

a. The permittee shall operate the particulate filtration system whenever this emissions unit is in operation.

b. The Permanent Total Enclosure (PTE) serving this emissions unit shall be installed and constructed in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) .

c. The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

d. The VOC content of each coating, as applied, shall not exceed 3.5 pounds of VOC per gallon, minus water and exempt solvents.

e. The VOC content of the clean up material, as applied, shall not exceed 6.71 pounds of VOC per gallon, minus water and exempt solvents.

f. This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR 63. The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

g. This emissions unit is subject to applicable sections of 40 CFR Part 63, Subpart A as denoted in 40 CFR Part 63, Subpart MMMM, Table 1.

h. The permittee has chosen to comply with the "Add on Controls Option" available in Subpart MMMM: 63.3891(c). This option has operational restrictions, work practice requirements and monitoring and record keeping requirements.

i. In accordance with 40 CFR 63.3890(b)(1) and by January 2, 2007, the organic HAP emissions shall not exceed 2.6 pounds of organic HAP per gallon of solids during each 12 month compliance period. The Organic HAP emission rate shall be as a rolling 12-month emission rate and determined on a monthly basis.

j. The hourly and annual emission limitations from natural gas combustion in the oven and in the Regenerative Thermal Oxidizer were established to reflect the potential to emit from the combustion of natural gas for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations specific to the combustion of natural gas.

c) Operational Restrictions

(1) The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the combustion chamber of the thermal incinerator, for any successive 3-hour period of time, shall not be below the average temperature observed during the most recent emission test that demonstrated the emissions unit was in compliance. The combustion temperature of the Regenerative Thermal Oxidizer and the average temperature of the combustion chamber of the Regenerative Thermal Oxidizer shall be measured at the same location.

[Authority for Term: OAC rule 3745-77-07(A)(1),PTI # 01-01289]

(2) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emission unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1),PTI # 01-01289]

(3) Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section b)(2) on an "as applied" basis.

[Authority for Term: OAC rule 3745-77-07(A)(1),PTI # 01-01289]

(4) In accordance with 40 CFR 63.3893(b), the permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and /or other additives, and cleaning materials used in and waste materials generated by the coating operation.

[Authority for Term: OAC rule 3745-77-07(A)(1),40 CFR 63.3893(b), PTI # 01-01289]

(5) In accordance with 40 CFR 63.3900, the permittee shall comply with the develop and implement a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3).

[Authority for Term: OAC rule 3745-77-07(A)(1),40 CFR 63.3900, 40 CFR 63.6(e)(3), PTI # 01-01289]

(6) In accordance with 40 CFR 63.3892(b), the permittee shall comply with the operating limits specified in Table 1 of subpart MMMM.

[Authority for Term: OAC rule 3745-77-07(A)(1),40 CFR 63.3892(b), PTI # 01-01289]

(7) The exit of the stack serving this emissions unit shall be a minimum of 50 feet above ground.

[Authority for Term: OAC rule 3745-77-07(A)(1),PTI # 01-01289]

(8) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filterin accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(C)(1)] OAC rule 3745-17-11(C)(1) and (2)(b)]

(9) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-17-11(C)(2)(e)]

(10) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filterin accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-17-11(C)(1) , OAC rule 3745-17-11 (2)(b) and OAC rule 3745-77-07(C)(1)]

(11) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the Regenerative Thermal Oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(2) For each day this emissions unit operates, the permitttee shall collect and record the following information for this emissions unit:

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

b. the VOC content of each coating, as applied, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the total number of hours the emissions unit was operated;

e. the total uncontrolled VOC emission rate from all coatings , in pounds ([the summation of d)(2)b X d)(2)c for each coating];

f. the calculated, controlled VOC emission rate for all coatings in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and

g. the average hourly controlled VOC emission rate, in pounds per hour, i.e., d)(2)f/d)(2)d. This calculation shall be performed within 7 days of the date this emissions unit operated.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(3) The permittee shall maintain and operate monitoring device(s) and a recorder which continuously measure and record the pressure differential from outside to inside the permanent total enclosure. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software. The monitoring and recording device(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(4) The permittee shall collect and record the following information for each operating day:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

b. all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was below the average temperature observed during the most recent emission test that demonstrated that the emissions unit was in compliance;

c. prior to the initial compliance demonstration, all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was less than 1400 degrees; and

d. all rolling, 1-hour blocks of time during which the average pressure differential between the permanent total enclosure and the outside area(s), when the emissions unit was in operation, was less than 0.007 inch of water column.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(5) For each lining, the permittee shall receive a USEPA Method 24 analysis with each shipment from the lining supplier. The analysis shall identify the name and address of the supplier, the supplier's coating identification number, and the following information:

a. date of shipment or delivery;

b. quantity of lining received, in gallons;

c. ICS's lining identification number;

d. the VOC content of each lining, in pounds per gallon, excluding water and exempt solvents.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(6) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(7) The permittee shall maintain a copy of each notification and report submitted to comply with the requirements of 40 CFR Part 63, Subpart MMMM.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR Part 63, Subpart MMMM, PTI # 01-01289]

(8) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.

[OAC 3745-17-11(C)(2)(a)]

(9) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(c)]

(10) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

(11) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA, Central District Office or local air upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

(12) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(e),(f), and (g), for [OAC rule 3745-17-11(C)(1)]

(13) In accordance with 40 CFR 62.3968 , the permittee shall comply the capture and control system requirements for continuous parameter monitoring system installation, operation, and maintenance.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 62.3968, PTI # 01-01289]

(14) The permittee shall maintain the records required by 40 CFR 63.3930.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 63.3930, PTI # 01-01289]

(15) This facility shall maintain daily records which list the following information for the combined cleanup material employed in emissions units K001 through K003

a. the name and identification of each cleanup material;

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

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

d. the total VOC emissions from all cleanup material employed, prior to any credit for recovered materials, in pounds i.e., the summation of the products of the amounts (c) of all cleanup materials applied (a) in emissions units K001 through K003, above, times each material's VOC content(b).

[Authority for term: OAC rule 3745-77-07(C)(1)PTI # 01-01289]

(16) If a credit for recovered materials is used to demonstrate compliance, the permittee shall maintain the following records for the recovered cleanup materials and the recovery tank serving the emissions units K001 through K003.

a. the date the recovery tank was emptied;

b. the date the materials from the recovery tank were shipped off site;

c. the number of gallons of materials from the recovery tank shipped off site;

d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

e. the total VOC emissions (in pounds ) from recovered cleanup materials , to be credited against the total VOC emissions from all cleanup materials applied in emissions units K001 through K003.

f. the average hourly VOC emission rate, in pounds per hour, i.e.,

d)(2)d/ ( d)(15)d – d)(16)e)

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which include the following information:

a. any record of a pressure differential deviation (excursion) report that identifies all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water, when the emissions unit was in operation;

b. an identification of each day, during which the average hourly VOC emissions from all coatings used in the source exceeded 2.85 pounds per hour, and the actual average hourly VOC emissions for each such day;

c. an identification of all successive 3-hour periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed; and

d. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

e. an identification of each day, during which the average hourly VOC emissions from all cleanup materials used in emissions units K001 through K003 exceeded 6.71 pounds per hour, and the actual average hourly VOC emissions for each such day;

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(2) The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

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

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(4) The permittee shall submit deviation (excursion) reports that identify all exceedances of the coating and clean up material VOC content limitations. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289]

(5) The permittee shall submit a notification of compliance status in accordance with 40 CFR 63.3910(c).

[Authority for term: OAC rule 3745-77-07(C)(1),PTI # 01-01289, 40 CFR 63.3910(c)]

(6) The permittee shall submit an initial notification report as required by 40 CFR 63.9(b)(2) of subpart A and shall be submitted by the dates specified by 40 CFR 63.9(b)(2) of subpart A.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 63.9(b)(2), PTI # 01-01289]

(7) The permittee shall submit semi annual reports in accordance with 40 CFR 63.3920.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 63.3920, PTI # 01-01289]

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: The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

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

i. The emission testing shall be conducted approximately 2 and a half years after issuance of this permit and within 6 months prior to permit expiration.

ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

iii. The test(s) shall be conducted while this emissions unit, K001 and K003 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA 's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section f)(1)a.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

b. Not later than 30 days prior to the proposed test date(s) , the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

c. Personnel from the Ohio EPA, Central District Office 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.

d. 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

Ohio EPA, Central District Office within 30 days following completion of the test(s).

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 51, OAC rule 3745-21-10, PTI # 01-01289]

(2) Emission Limitation: Visible particulate emissions from the stack shall not exceed 5% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, OAC rule 3745-17-03(B)(1),01-01289]

(3) Emission Limitation:The VOC content of each coating, as applied, shall not exceed 3.5 pounds of VOC per gallon, minus water and exempt solvents.

Applicable Compliance Method: USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A,PTI # 01-01289]

(4) Emission Limitation:Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 1.15 lbs of NOx/hr.

Applicable Compliance Method: Compliance with the allowable mass emission rate for NOx emissions from the natural gas usage in the incinerator and the associated oven may be determined by multiplying an emission factor of 100 lb of NOx/mmscf by the associated RTO's maximum hourly fuel usage of 0.010 mmscf/hr and each burner's maximum hourly fuel usage of 0.001 MMscf/hr and 0.0007 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A,PTI # 01-01289]

(5) Emission Limitation: Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.966 lb CO/hr .

Applicable Compliance Method:Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the incinerator and the associated oven

may be determined by multiplying an emission factor of 84lb of CO/mmscf by the associated RTO's maximum hourly fuel usage of 0.010 mmscf/hr and each burner's maximum hourly fuel usage of 0.001 mmscf/hr and 0.0007 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, PTI # 01-01289]

(6) Emission Limitation:Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.007 lb of SO2/hr .

Applicable Compliance Method:Compliance with the allowable mass emission rate for SO2 emissions from the natural gas usage in the incinerator and the associated oven may be determined by multiplying an emission factor of 0.6 lb of SO2/mmscf by the associated RTO's maximum hourly fuel usage of 0.010 mmscf/hr and each burner's maximum hourly fuel usage of 0.001 mmscf/hr and 0.0007 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, PTI # 01-01289]

(7) Emission Limitation: Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.063 lb of VOC/hr .

Applicable Compliance Method:Compliance with the allowable mass emission rate for VOC emissions from the natural gas usage in the incinerator and the associated oven may be determined by multiplying an emission factor of 5.5 lb of VOC/mmscf by the associated RTO's maximum hourly fuel usage of 0.010 mmscf/hr and each burner's maximum hourly fuel usage of 0.001 mmscf/hr and 0.0007 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A, PTI # 01-01289]

(8) Emission Limitation:Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.087 lb of PM/hr.

Applicable Compliance Method: Compliance with the allowable mass emission rate for particulate emissions from the natural gas usage in the incinerator and the associated oven may be determined by multiplying an emission factor of 7.6lb PM/mmscf by the

associated RTO's maximum hourly fuel usage of 0.010 mmscf/hr and each burner's maximum hourly fuel usage of 0.001 mmscf/hr and 0.0007 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, PTI # 01-01289]

(9) Emission Limitation:Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.38 ton of PM/yr; Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.03 ton of SO2/yr; Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.28 ton of VOC/yr; Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 5.04 tons of NOx/yr; Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 4.23 tons of CO/yr.

Applicable Compliance Method:Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(10) Emission Limitation: Volatile Organic Compound(VOC) emissions from coatings shall not exceed 2.85 pounds per hour .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section d)(2)g.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(11) Emission Limitation: Volatile Organic Compound(VOC) emissions from coatings shall not exceed 12.48 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(12) Emission Limitation: Particulate emissions from coatings shall not exceed 5.52 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000)

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(13) Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour.

Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section d)(16)f.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(14) Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 3.5 tons per year.

Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Sections d)(15)d and d)(16)e.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(15) Emission Limitation:The VOC content of the clean up material, as applied, shall not exceed 6.71 pounds of VOC per gallon, minus water and exempt solvents

Applicable Compliance Method: USEPA Method 24 shall be used to determine the VOC contents for the cleanup materials recovered. If an owner or operator determines that Method 24 cannot be used for a particular lining, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that lining to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, PTI # 01-01289]

g) Miscellaneous Requirements

(1) None.

**3. K003, Drum Lid Painting/Lining**

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

Drum lid coating paint booths and drying oven.

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#01-01289) | Volatile Organic Compound(VOC) emissions from coatings and linings shall not exceed 0.60 pound per hour and 2.63 tons per year.<br><br>Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour and 3.5 tons per year.<br><br>See b)(2)a-i below.<br><br>Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed:<br><br>1.37 lbsNOx/hr;<br>6.01 tons NOx/yr;<br>0.008 lb SO2/hr;<br>0.035 ton SO2/yr;<br>1.15 lbs CO/hr;<br>5.05 tons CO/yr;<br>0.104 lb PM/hr;<br>0.46 ton PM/yr;<br>0.075 lb VOC/hr; and<br>0.33 ton VOC/yr.<br><br>Particulate emissions from coatings and |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | linings shall not exceed 2.41 tons per year.<br><br>Visible particulate matter (PM) emissions shall not exceed 5% opacity.<br><br>Compliance with this rule also includes compliance with the requirements of 40 CFR 63 subpart MMMM and OAC rule 3745-17-11(B)(1). |
| b. | OAC rule 3745-17-07(A)(1) | The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-11(C) | The requirements specified in this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3). |
| d. | OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6) | The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3). |
| e. | 40 CFR 63 subpart MMMM | See b)(2)f-j. |

(2) Additional Terms and Conditions

a. The permittee shall operate the particulate filtration system whenever this emissions unit is in operation.

b. The Permanent Total Enclosure (PTE) serving this emissions unit shall be installed and constructed in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) .

c. The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

d. The VOC content of each lining, as applied, shall not exceed 4.3 pounds of VOC per gallon, minus water and exempt solvents.

e. The VOC content of each coating, as applied, shall not exceed 3.5 pounds of VOC per gallon, minus water and exempt solvents.

f. The VOC content of the cleanup material, as applied, shall not exceed 6.71 pounds of VOC per gallon, minus water and exempt solvents.

g. This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR 63. The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

h. This emissions unit is subject to applicable sections of 40 CFR Part 63, Subpart A as denoted in 40 CFR Part 63, Subpart MMMM, Table 1.

i. The permittee has chosen to comply with the "Add on Controls Option" available in Subpart MMMM: 63.3891(c). This option has operational restrictions, work practice requirements and monitoring and record keeping requirements.

j. In accordance with 40 CFR 63.3890(b)(1), the organic HAP emissions shall not exceed 2.6 pounds of organic HAP per gallon of solids during each 12 month compliance period. The Organic HAP emission rate shall be as a rolling 12-month emission rate and determined on a monthly basis.

k. The hourly and annual emission limitations from natural gas combustion in the ovens and in the Regenerative Thermal Oxidizer were established to reflect the potential to emit from the combustion of natural gas for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations specific to the combustion of natural gas.

c) Operational Restrictions

(1) The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the combustion chamber of the thermal incinerator, for any successive 3-hour period of time, shall not be below the average temperature observed during the most recent emission test that demonstrated the emissions unit was in compliance. The combustion temperature of the Regenerative Thermal Oxidizer and the average temperature of the combustion chamber of the Regenerative Thermal Oxidizer shall be measured at the same location.

[Authority for term: OAC rule 3745-77-07(A)(1), PTI # 01-01289]

(2) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emission unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1), PTI # 01-01289]

(3) Each lining and coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.2 on an "as applied" basis.

[Authority for term: OAC rule 3745-77-07(A)(1), PTI # 01-01289]

(4) In accordance with 40 CFR 63.3893(b), the permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and /or other additives, and cleaning materials used in and waste materials generated by the coating operation.

[Authority for term: OAC rule 3745-77-07(A)(1),40 CFR 63.3893(b), PTI # 01-01289]

(5) In accordance with 40 CFR 63.3900, thepermittee shall comply with the develop and implement a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6.

[Authority for term: OAC rule 3745-77-07(A)(1),40 CFR 63.3900, PTI # 01-01289]

(6) In accordance with 40 CFR 63.3892(b) , the permittee shall comply with the operating limits specified in Table 1 of subpart MMMM.

[Authority for term: OAC rule 3745-77-07(A)(1),40 CFR 63.3892(b), PTI # 01-01289]

(7) The exit of the stack serving this emissions unit shall be a minimum of 50 feet above ground.

[Authority for term: OAC rule 3745-77-07(A)(1), PTI # 01-01289]

(8) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filterin accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-17-11(C)(1) , OAC rule 3745-17-11 (2)(b) and OAC rule 3745-77-07(C)(1)]

(9) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for Term: OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the Regenerative Thermal Oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(2) For each day this emissions unit operates, the permitttee shall collect and record the following information for this emissions unit:

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

b. the VOC content of each coating and lining, as applied, in pounds per gallon;

c. the number of gallons of each coating and lining employed;

d. the total number of hours the emissions unit was operated;

e. the total uncontrolled VOC emission rate from all coatings and linings , in pounds ([the summation of d)(2)b X d)(2)c for each coating and lining] ;

f. the calculated, controlled VOC emission rate for all coatings and linings in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and

g. the average hourly controlled VOC emission rate, in pounds per hour, i.e., d)(2)f/d)(2)d. This calculation shall be performed within 7 days of the date this emissions unit operated.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(3) The permittee shall maintain and operate monitoring device(s) and a recorder which continuously measure and record the pressure differential from outside to inside the permanent total enclosure. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software. The monitoring and recording device(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(4) The permittee shall collect and record the following information for each operating day:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

b. all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was below the average temperature observed during the most recent emission test that demonstrated that the emissions unit was in compliance;

c. prior to the initial compliance demonstration, all successive 3-hour periods of time during which the average combustion temperature within the Regenerative

Thermal Oxidizer, when the emissions unit was in operation, was less than 1400 degrees; and

d. all rolling, 1-hour blocks of time during which the average pressure differential between the permanent total enclosure and the outside area(s), when the emissions unit was in operation, was less than 0.007 inch of water column.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(5) For each coating, the permittee shall receive a USEPA Method 24 analysis with each shipment from the coating supplier. The analysis shall identify the name and address of the supplier, the supplier's coating identification number, and the following information:

a. date of shipment or delivery;

b. quantity of coating received, in gallons;

c. ICS's coating identification number; and

d. the VOC content of each coating, in pounds per gallon, excluding water and exempt solvents.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(6) For each lining, the permittee shall receive a USEPA Method 24 analysis with each shipment from the lining supplier. The analysis shall identify the name and address of the supplier, the supplier's lining identification number, and the following information:

a. date of shipment or delivery;

b. quantity of lining received, in gallons;

c. ICS's lining identification number;

d. the VOC content of each lining, in pounds per gallon, excluding water and exempt solvents.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(7) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(8) The permittee shall maintain a copy of each notification and report submitted to comply with the requirements of 40 CFR Part 63, Subpart MMMM.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR Part 63, Subpart MMMM, PTI # 01-01289]

(9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.

[Authority for Term: OAC 3745-17-11(C)(2)(a)]

(10) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-17-11(C)(2)(c)]

(11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for Term: OAC rule 3745-17-11(C)(2)(c)]

(12) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA, Central District Office upon request.

[Authority for Term: OAC rule 3745-17-11(C)(2)(d) and (f)]

(13) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for Term: OAC rule 3745-17-11(C)(2)(e),(f), and (g)], for [OAC rule 3745-17-11(C)(1)]

(14) In accordance with 40 CFR 62.3968, the permittee shall comply the capture and control system requirements for continuous parameter monitoring system installation, operation, and maintenance.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 62.3968, PTI # 01-01289]

(15) The permittee shall maintain the records required by 40 CFR 63.3930.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 63.3930, PTI # 01-01289]

(16) This facility shall maintain daily records which list the following information for the combined cleanup material employed in emissions units K001 through K003

a. the name and identification of each cleanup material;

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

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

d. the total VOC emissions from all cleanup material employed, prior to any credit for recovered materials, in pounds i.e., the summation of the products of the amounts (c) of all cleanup materials applied (a) in emissions units K001 through K003, above, times each material's VOC content (b).

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(17) If a credit for recovered materials is used to demonstrate compliance, the permittee shall maintain the following records for the recovered cleanup materials and the recovery tank serving the emissions units K001 through K003.

a. the date the recovery tank was emptied;

b. the date the materials from the recovery tank were shipped off site;

c. the number of gallons of materials from the recovery tank shipped off site;

d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

e. the total VOC emissions (in pounds ) from recovered cleanup materials , to be credited against the total VOC emissions from all cleanup materials applied in emissions units K001 through K003.

f. the average hourly VOC emission rate, in pounds per hour, i.e., d)(2)d/ ( d)(16)d – d)(17)e)

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which include the following information:

a. any record of a pressure differential deviation (excursion) report that identifies all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water, when the emissions unit was in operation;

b. an identification of each day, during which the average hourly VOC emissions from all linings and coatings used in the source exceeded 0.60 pound per hour, and the actual average hourly VOC emissions for each such day;

c. an identification of all successive 3-hour periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed; and

d. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

e. an identification of each day, during which the average hourly VOC emissions from all cleanup materials used in emissions units K001 through K003 exceeded 6.71 pounds per hour, and the actual average hourly VOC emissions for each such day;

f. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(2) The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(3) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by

including and identifying the specific emission data and calculations for this emissions unit in the annual Title V Fee Emission Report to be submitted by April 15 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(4) The permittee shall submit deviation (excursion) reports that identify all exceedances of the coating, lining and clean up material VOC content limitations. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(5) The permittee shall submit a notification of compliance status in accordance with 40 CFR 63.3910(c).

[Authority for term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(6) The permittee shall submit an initial notification report as required by 40 CFR 63.9(b)(2) of subpart A and shall be submitted by the dates specified by 40 CFR 63.9(b)(2) of subpart A.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.3910(c), PTI # 01-01289]

(7) The permittee shall submit semi annual reports in accordance with 40 CFR 63.3920.

[Authority for term: OAC rule 3745-77-07(C)(1),40 CFR 63.3920, PTI # 01-01289]

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: The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

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

i. The emission testing shall be conducted approximately 2 and a half years after issuance of this permit and within 6 months prior to permit expiration.

ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

iii. The test(s) shall be conducted while this emissions unit, K001 and K002 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA 's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section f)(1)a.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

b. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

c. Personnel from the Ohio EPA, Central District Office 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.

d. 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 Ohio EPA, Central District Office within 30 days following completion of the test(s).

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 51, Appendix M, OAC rule 3745-21-10, PTI # 01-01289]

(2) Emission Limitation: Visible particulate emissions from the stack shall not exceed 5% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, OAC rule 3745-17-03(B)(1),01-01289]

(3) Emission Limitation: The VOC content of each coating, as applied, shall not exceed 3.5 pounds of VOC per gallon, minus water and exempt solvents.

Applicable Compliance Method: USEPA Method 24 shall be used to determine the VOC contents for the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, PTI # 01-01289]

(4) Emission Limitation: The VOC content of each lining, as applied, shall not exceed 4.3 pounds of VOC per gallon, minus water and exempt solvents.

Applicable Compliance Method: USEPA Method 24 shall be used to determine the VOC contents for the linings. If an owner or operator determines that Method 24 cannot be used for a particular lining, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that lining to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A,PTI # 01-01289]

(5) Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 1.37 lbs of NOx/hr.

Applicable Compliance Method: Compliance with the allowable mass emission rate for NOx emissions from the natural gas usage in the incinerator and the two associated ovens may be determined by multiplying an emission factor of 100 lb of NOx/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and each associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A,PTI # 01-01289]

(6) Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 1.15 lbs of CO/hr .

Applicable Compliance Method: Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the incinerator and the two associated ovens may be determined by multiplying an emission factor of 84 lb of CO/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and each associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, PTI # 01-01289]

(7) Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.008 lbpf SO2/hr .

Applicable Compliance Method: Compliance with the allowable mass emission rate for SO2 emissions from the natural gas usage in the incinerator and the two associated ovens may be determined by multiplying an emission factor of 0.6 lb of SO2/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and each associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A,PTI # 01-01289]

(8) Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.075 lb of VOC/hr .

Applicable Compliance Method: Compliance with the allowable mass emission rate for VOC emissions from the natural gas usage in the incinerator and the two associated ovens may be determined by multiplying an emission factor of 5.5 lb of VOC/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and each associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A,PTI # 01-01289]

(9) Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.104 lb of PM/hr.

Applicable Compliance Method: Compliance with the allowable mass emission rate for particulate emissions from the natural gas usage in the incinerator and the two associated ovens may be determined by multiplying an emission factor of 7.6 lb PM/MMscf by the associated RTO's maximum hourly fuel usage of 0.0098 MMscf/hr and each associated ovens's maximum hourly fuel usage of 0.00196 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A,PTI # 01-01289]

(10) Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.46 ton of PM/yr; Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.035 ton of SO2/yr; Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.33 ton of VOC/yr; Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 6.01 tons of NOx/yr; Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 5.05 tons of CO/yr;

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(11) Emission Limitation: Volatile Organic Compound(VOC) emissions from coatings and linings shall not exceed 0.60 pound per hour .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section d)(2)j.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(12) Emission Limitation: Volatile Organic Compound(VOC) emissions from coatings and linings shall not exceed 2.63 tons per year.

Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(13) Emission Limitation: Particulate emissions from coatings and linings shall not exceed 2.41 tons per year.

Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(14) Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour.

Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section d)(12)f.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(15) Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 3.5 tons per year.

Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Sections d)(11)d and d)(12)e.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI # 01-01289]

(16) Emission Limitation:The VOC content of the clean up material, as applied, shall not exceed 6.71 pounds of VOC per gallon, minus water and exempt solvents

Applicable Compliance Method USEPA Method 24 shall be used to determine the VOC contents for the cleanup materials recovered. If an owner or operator determines that Method 24 cannot be used for a particular lining, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that lining to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A,PTI # 01-01289]

g) Miscellaneous Requirements

(1) None.

**4. N002, Thermal Oxidizer**

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

19.2 MM Btu/hr drum reclamation furnace.

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)<br>(PTI# 01-06852) | Particulate emissions shall not exceed 4.9 pounds per hour and 10.57 tons per year.<br><br>PM-10 emissions shall not exceed 4.4 pounds per hour.<br><br>Organic Compound (OC) emissions shall not exceed 9.0 pounds per hour.<br><br>Carbon Monoxide (CO) emissions shall not exceed 50 ppmv on an hourly average basis.<br><br>CO emissions shall not exceed 2.97 pounds per hour and 8.25 tons per year.<br><br>Sulfur dioxide emissions shall not exceed 3.9 pounds per hour and 16.9 tons per year.<br><br>Nitrogen oxides (NOx) emissions shall not exceed 10.5 pounds per hour and 29.2 tons per year.<br><br>Metals limits:<br><br>As emissions shall not exceed 0.0042 pound per hour and 0.0091 ton per year. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | Be shall not exceed 0.0005 pound per hour and 0.0011 ton per year.<br><br>Cd emissions shall not exceed 0.010 pound per hour and 0.022 ton per year.<br><br>Cr emissions shall not exceed 0.004 pound per hour and 0.0076 ton per year.<br><br>Pb emissions shall not exceed 0.052 pound per hour and 0.11 ton per year.<br><br>Hg emissions shall not exceed 0.005 pound per hour and 0.011 ton per year.<br><br>Ni emissions shall not exceed 0.0076 pound per hour and 0.02 ton per year.<br><br>Visible particulate emissions shall not exceed 5 percent opacity as a 6-minute average.<br><br>OC emissions shall be controlled by a minimum overall control efficiency of 95%.<br><br>The Thermal oxidizer controlling emissions from N002 shall operate with a minimum control efficiency of 95%.<br><br>This emissions unit shall not feed production for more than 83 hours per week.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-09(B) and (C). |
| b. | OAC rule 3745-17-09(B) | Particulate emissions shall not exceed 0.10 pound per 100 pounds of salvageable material. |
| c. | OAC rule 3745-17-09(C) | This emissions unit shall be designed, operated, and maintained so as tp prevent the emission of objectionable odors. |
| d. | OAC rule 3745-17-07(A)(1) | The visible emission limitation specified by this rule is less stringent than the |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3) |

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit includes the use of a permanent total enclosure(PTE) for capturing the OC emissions from the drum handling building and drum furnace with the venting of the captured emissions from the drum handling building and the drum reclamation furnace to add-on organic compound (OC) emission controls which maintain a minimum destruction and removal (DRE) efficiency of 95 percent by weight. (The current OC emission control consists of a thermal oxidizer)

b. The permittee shall maintain the monitoring plan for the OC capture system submitted to the Ohio EPA, Central District Office on September 24, 1996. The plan includes the following:

i. the parameter(identified as a PTE differential pressure) to be continuously measured and recorded for verifying the OC emissions capture efficiency;

ii. the manufacturer of the monitoring device and recording instrumentation; and

iii. The Quality Assurance/Quality Control (QA/QC) plan to ensure that the monitor is maintained and operated in accordance with manufacturer's specifications.

c. The permittee shall maintain and operate a monitoring system that continuously measures and records the value of the differential pressure to verify the OC capture rate during operation of this emissions unit

The total enclosure shall meet the design requirements set forth in USEPA guidance document EPA/4-91-010, Method 204 unless otherwise approved in writing by Ohio EPA and USEPA as indicated in the guidance document.

The permittee shall operate the monitoring and recording system anytime material handling is taking place or the drum reconditioning furnace is being operated for production purposes or for the completion of the burn down cycle.

d. A statement of certification for the existing continuous CO monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 4. Proof of certification shall be made available to the Ohio EPA, Central District Office upon request.

e. The permittee shall maintain the Preventative Maintenance and Malfunction Abatement Plan(PM&MAP), submitted to the Ohio EPA, Central District Office on January 30, 1997 for the drum reconditioning process. The plan includes, at a minimum, monthly inspections using the PM and MAP procedures recommended by the equipment manufacturer. The inspection shall include a written report containing any needed repairs. Repairs shall be completed within 30 days of the inspection. If a time period longer than 30 days is needed to complete the repairs, the Ohio EPA, Central District Office shall be notified in writing. This notice shall list the repairs needed and the reason(s) the repairs could not be accomplished sooner.

f. The permittee shall maintain the drum inspection plan submitted to the Ohio EPA, Central District Office on July 30, 1996. The inspection procedure includes the following:

i. a description of the inspection method used to ensure that drums not meeting the RCRA definition of empty are not processed; and,

ii. a description of the training which inspectors or operators are given to allow them to identify non RCRA empty drums.

g. The design of this emissions unit shall meet good engineering practices so as not to cause excessive exhaust gas concentrations of any air contaminant.

c) Operational Restrictions

(1) The thermal oxidizer shall provide at least 0.5 second of retention time and a combustion chamber exhaust gas temperature of not less than 1800 degrees Fahrenheit.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI# 01-06852]

(2) The interlock device which prevents the feed of drums until the thermal oxidizer's exhaust gas temperature has reached 1800 degrees Fahrenheit shall be functioning at all times.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI# 01-06852]

(3) Burners within the drum reclamation furnace and thermal oxidizer are permitted to operate during non-production periods in order to prevent excessive heating and cooling of refractory. During these non-production periods, the thermal oxidizer shall be maintained at a minimum temperature of 1800 degrees Fahrenheit until all wastes are completely combusted and the burn-down cycle is complete. For the purposes of this permit, the burn down cycle is defined as the operating time in which the drum reclamation furnace is operable; however, material handling and the feeding of drums has ceased, and the furnace is being operated to ensure complete combustion of all residual waste.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI# 01-06852]

(4) The permittee shall not process any drum in this emissions unit that does not meet the RCRA definition of empty as specified in OAC rule 3745-51-07.

[Authority for Term: OAC rule 3745-77-07(A)(1), OAC rule 3745-51-07, PTI# 01-06852]

(5) At a minimum, at least one spare thermocouple and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI# 01-06852]

(6) If the drum reconditioning process is in need of repairs it shall not be operated of operation will result in the exceedance of any term and condition detailed in this permit.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI# 01-06852]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1), PTI# 01-06852]

(2) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the combustion temperature on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI# 01-06852]

(3) Whenever the monitored combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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 acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office . The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1),OAC rule 3745-15-06, PTI# 01-06852]

(4) The permittee shall maintain a log book for this emissions unit which will be used to record the date, time of start-up, time of shutdown and recording person's signature. The permittee shall also record in the log book the total number of hours of operation each week for this emissions unit.

Start-up is defined as the time in which material handling or drum reconditioning has begun. Shutdown is defined as the time at which the burn down cycle is complete.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI# 01-06852]

(5) The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60.

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

a. emissions of CO in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;

b. emissions of CO in units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous CO monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous CO monitoring system;

h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous CO monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

[Authority for term: OAC rule 3745-77-07(C)(1), [40 CFR 60.13] and [40 CFR Part 60, Appendices B & F, PTI# 01-06852]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the combustion temperature within the thermal oxidizer was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. each incident of deviation described in "a"or "b" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a"or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s).

[OAC rule 3745-77-07(C)(1), PTI# 01-06852]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1), PTI# 01-06852]

(3) The permittee shall submit quarterly reports that summarize the total number of hours of operation during each week for the previous calendar quarter. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1), PTI# 01-06852]

(4) The permitte shall submit annual reports which specify the total emissions of particulates, carbon monoxide, sulfur dioxide, nitrogen oxides, AS, Be, Cd, Cr, Pb, Hg, and Ni from this emissions unit for the previous calendar year. These annual reports shall be submitted by April 15$^{th}$ of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[OAC rule 3745-77-07(C)(1), PTI# 01-06852]

(5) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Central District Office, documenting all instances of CO emissions in excess of any

applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

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

i. the facility name and address;

ii. the manufacturer and model number of the continuous CO and other associated monitors;

iii. continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total CO emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous CO monitoring system while the emissions unit was in operation;

viii. results and dates of quarterly cylinder gas audits;

ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction** of the continuous CO monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime** of the continuous CO monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

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

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 60.7, PTI# 01-06852]

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: Particulate emissions shall not exceed 4.9 pounds per hour;Organic Compound (OC) emissions shall not exceed 9.0 pounds per hour; CO emissions shall not exceed 2.97 pounds per hour; Nitrogen oxides (NOx) emissions shall not exceed 10.5 pounds per hour; As emissions shall not exceed 0.0042 pound per hour; Be shall not exceed 0.0005 pound per hour; Cd emissions shall not exceed 0.010 pound per hour; Cr emissions shall not exceed 0.004 pound per hour; Pb emissions shall not exceed 0.052 pound per hour; Hg emissions shall not exceed 0.005 pound per hour;and Ni emissions shall not exceed 0.0076 pound per hour.

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

i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE, CO, $NO_x$, $SO_2$, VOC and metals

iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:

PE, Methods 1-5 of 40 CFR Part 60, Appendix A.

NOx, Methods 1-4 and 7E of 40 CFR Part 60, Appendix A.

CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A

VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

Metals, Methods 1-4 and 29 of 40 CFR Part 60, Appendix A

iv. 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 Ohio EPA, CDO.

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

vi. Personnel from the Ohio EPA, Central District Office 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.

vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A., PTI# 01-06852]

b. Emissions Limitation: OC emissions shall be controlled by a minimum overall control efficiency of 95%.The Thermal oxidizer controlling emissions from N002 shall operate with a minimum control efficiency of 95%.

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

i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration..

ii. The following test method(s) shall be employed to determine the capture and control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A,Methods 1-4 and 25 or 25A, as appropriate and 40CFR Part 51, Appendix M, Method 204.

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

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

iii. 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 Ohio EPA, CDO.

iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

v. Personnel from the Ohio EPA, Central District Office 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.

vi. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 51, Appendix M, 40 CFR Part 60, Appendix A., 3745-21-10, PTI# 01-06852]

c. Emissions Limitation: 50 ppmv CO on an hourly average basis.

Applicable Compliance Method: Compliance shall be demonstrated through the use of the CEM data recorded in section d)(5).

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI# 01-06852]

d. Emissions Limitation: PM-10 emissions shall not exceed 4.4 pounds per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 40 CFR Part 51, Appendix M, method 201.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, 40 CFR Part 51, Appendix M, PTI# 01-06852]

e. Emissions Limitation: Sulfur dioxide emissions shall not exceed 3.9 pounds per hour;

Applicable Compliance Method: Compliance with the hourly sulfur dioxide emissions limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of 5,000 scf/hr by the AP-42 (Supplement D, 7/98, Table 1.4-2) emission factor of 0.6 lb SO2/10^6 scf.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI# 01-06852]

f. Emissions Limitation: Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A ,PTI# 01-06852]

g. Emissions Limitation: Particulate emissions shall not exceed 10.57 tons per year;CO emissions shall not exceed 8.25 tons per year;Sulfur dioxide emissions shall not exceed 16.9 tons per year;Nitrogen oxides (NOx) emissions shall not exceed 10.5 pounds per hour and 29.2 tons per year;As emissions shall not exceed 0.0091 ton per year; Be shall not exceed 0.0011 ton per year;Cd emissions shall not exceed 0.022 ton per year; Cr emissions shall not exceed 0.0076 ton per year;Pb emissions shall not exceed 0.11 ton per year; Hg emissions shall not exceed 0.011 ton per year; Ni emissions shall not exceed 0.02 ton per year.

Applicable Compliance Method: Compliance with the annual emissions limitations shall be assumed as long as compliance is maintained with the 83 hour per week operational limitation.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI# 01-06852]

g) Miscellaneous Requirements

(1) None.

**5. P001, Tum Blaster**

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

Shotblasting of 55-gallon steel drum rings.

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 3745-17-11(B)(1) | Particulate emissions shall not exceed 3.38 pounds per hour. |
| b. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

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

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 10.0 inches of water.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The

permittee shall record the pressure drop across the baghouse on once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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 acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit

will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-15-06]

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” 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)]

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director ( Ohio EPA,Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[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 Limitations: Particulate emissions shall not exceed 3.38 pounds per hour.

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

i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.

iv. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for PE: 40 CFR Part 60, Appendix A, Methods 1 through 5;

iv. 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 Ohio EPA, CDO.

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

vi. Personnel from the Ohio EPA, Central District Office 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.

vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A]

b. Emissions Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A]

g) Miscellaneous Requirements

(1) None.

**6. P005, Horizontal Shotblaster**

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

Shotblasting of 55-gallon steel drums.

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 3745-17-11(B)(1) | Particulate emissions shall not exceed 19.69 pounds per hour. |
| b. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 10.0 inches of water.

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

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The

permittee shall record the pressure drop across the baghouse on once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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 acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit

will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-15-06]

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” 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)]

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[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 Limitations: Particulate emissions shall not exceed 19.69 pounds per hour.

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

i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.

iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for PE: 40 CFR Part 60, Appendix A, Methods 1 through 5;

iv. 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 Ohio EPA, CDO.

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

vi. Personnel from the Ohio EPA, Central District Office 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.

vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A]

b. Emissions Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A]

g) Miscellaneous Requirements

(1) None.

**7. P012, 10-Wheel Shotblaster**

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

Shotblasting of 55-gallon steel drums.

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# 01-3786) | Particulate emissions shall not exceed 1.45 pounds per hour and 0.01 grain per dry standard cubic foot. |
| b. | OAC rule 3745-17-11(B)(1) | The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 10.0 inches of water.

[OAC rule 3745-77-07(C)(1), PTI# 01-3786]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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 acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-15-06]

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1), PTI# 01-3786]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” 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.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1), PTI# 01-3786]

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: Particulate emissions shall not exceed 1.45 pounds per hour and 0.01 grain per dry standard cubic foot.

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

i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.

iv. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for PE: 40 CFR Part 60, Appendix A, Methods 1 through 5;

iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by theOhio EPA, CDO.

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

vi. Personnel from the Ohio EPA, Central District Office 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.

vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, PTI# 01-3786]]

b. Emissions Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A,PTI# 01-3786]

g) Miscellaneous Requirements

(1) None.

**8. P013, Lid Blaster**

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

Shotblasting of 55-gallon steel drum lids.

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# 01-3786) | Particulate emissions shall not exceed 2.25 pounds per hour and 0.015 grain per dry standard cubic foot.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). |
| b. | OAC rule 3745-17-11(B)(1) | The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1.0 to 10.0 inches of water.

[OAC rule 3745-77-07(C)(1), PTI# 01-3786]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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 acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1),OAC rule 3745-15-06, PTI# 01-3786]

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1), PTI# 01-3786]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” 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.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1),PTI# 01-3786]

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: Particulate emissions shall not exceed 2.25 pounds per hour and 0.015 grain per dry standard cubic foot.

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

i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.

v. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for PE: 40 CFR Part 60, Appendix A, Methods 1 through 5;

iv. 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 Ohio EPA, CDO.

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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,

Central District Office's refusal to accept the results of the emission test(s).

vi. Personnel from the Ohio EPA, Central District Office 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.

vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A PTI# 01-3786]

b. Emissions Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A PTI# 01-3786]

g) Miscellaneous Requirements

(1) None.

**9. P017, Progressive Preflusher**

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

Interior flushing of all closed head drums by caustic solution. (formerly Z009)

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# P0107000) | Volatile Organic Compound (VOC) emissions shall not exceed 0.50 pound per hour.<br><br>Volatile Organic Compound (VOC) emissions shall not exceed 2.19 tons per year.<br><br>Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity. |
| b. | OAC rule 3745-17-11(B)(1) | Particulate emissions shall not exceed 0.551 pound per hour. |
| c. | OAC rule 3745-17-07(A) | The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

b. The scrubber controlling emissions from this emissions unit shall be equipped with a mist eliminator.

c) Operational Restrictions

(1) The water flow rate through the wet scrubber shall be maintained at 10 gallons per minute or higher until the initial emission testing has been completed. Thereafter, the average water flow rate through the wet scrubber, for any successive 3-hour block of time when the emissions unit is in operation, shall not be below the average value observed during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI# P0107000]

(2) The pressure drop across the wet scrubber shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI# P0107000]

(3) The pressure drop across the mist eliminator shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI# P0107000]

(4) The pH of the wet scrubber's liquor shall be maintained within the range of 5 to 10 while the emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI# P0107000]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the wet scrubber (in pounds per square inch, gauge) and the wet scrubber's water flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the wet scrubber and the wet scrubber's water flow rate on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop and flow rate readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

These range(s) and/or limit(s) for the wet scrubber's pressure drop and water flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for pressure drop or water flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable emission limitations for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification

The permittee shall properly install, operate, and maintain equipment to continuously monitor the pH of the wet scrubber's liquor during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pH of the wet scrubber's liquor on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the PH limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

l. the date and time the deviation began;

m. the magnitude of the deviation at that time;

n. the date the investigation was conducted;

o. the name(s) of the personnel who conducted the investigation; and

p. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

q. a description of the corrective action;

r. the date the corrective action was completed;

s. the date and time the deviation ended;

t. the total period of time (in minutes) during which there was a deviation;

u. the pressure drop and flow rate readings immediately after the corrective action was implemented; and

v. the name(s) of the personnel who performed the work.

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

These range(s) and/or limit(s) for the pH of the wet scrubber's liquor are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the PH based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1),OAC rule 3745-15-06 ,PTI# P0107000]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the mist eliminator (in pounds per square inch, gauge) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the pressure drop across the mist eliminator on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and

maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a.. a description of the corrective action;

b. the date the corrective action 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 flow rate readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

These range(s) and/or limit(s) for the pressure drop across the mist eliminator are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the pressure drop based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring

requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1),OAC rule 3745-15-06, PTI# P0107000]

(2) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the material, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term: OAC rule 3745-77-07(C)(1),ORC 3704.03(F)(4)(b), OAC rule 3745 114 01, PTI# P0107000]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reportsof the following records for the wet scrubber:

a. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the wet scrubber.

b. any records of downtime (date and length of time) for the capture (collection) systemand/or the monitoring equipment when the emissions unit(s) was/were in operation; and

c. a log of the operating time for the capture system, scrubbers, monitoring equipment, and the emissions unit(s).

d. an identification of all periods of time during which the wet scrubber's water flow rate was not maintained at or above the required level.

e. an identification of all periods of time during which the pH of the wet scrubber's liquor, when the emissions unit was in operation, was below 5 or greater than 10;

f an identification of all periods of time during which the pressure drop across the wet scrubber, when the emissions unit was in operation, was below 2 or greater than 5;

g. an identification of all periods of time during which the pressure drop across the mist eliminator, when the emissions unit was in operation, was below 2 or greater than 5;

h. each incident of deviation described in e)1.e through e)1.g (above) where a prompt investigation was not conducted;

i. each incident of deviation described in e)1.e through e)1.g (above) where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

j. each incident of deviation described in e)1.e through e)1.g (above) 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.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI# P0107000]

(2) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Title V Fee Emission Report to be submitted by April 15 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI# P0107000]

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. Emissions Limitation: VOC emissions shall not exceed 0.50 pound per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emissions Limitation: Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method:If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.

c. Emission Limitation: Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emissions Limitation: VOC emissions shall not exceed 2.19 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[Authority for Term: OAC rule 3745-77-07(C)(1),40 CFR Part 60, Appendix A PTI# P0107000]

g) Miscellaneous Requirements

(1) None.

**10. P019, VOC Flusher**

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

VOC flusher

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# P0107000) | Volatile Organic Compound (VOC) emissions shall not exceed 1.43 pounds per hour.<br><br>Volatile Organic Compound (VOC) emissions shall not exceed 6.26 tons per year.<br><br>Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity. |
| b. | OAC rule 3745-17-11(B)(1) | Particulate emissions shall not exceed 0.551 pound per hour. |
| c. | OAC rule 3745-17-07(A) | The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

a. All VOC emissions from this emissions unit shall be vented to a thermal oxidizer at all times this emissions unit is in operation.

b. The Regenerative Thermal Oxidizer controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 98%, by weight, for VOC emissions.

c) Operational Restrictions

(1) The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until the initial emissions' testing has been completed. Thereafter, the average temperature of the exhaust gases from the combustion chamber of the thermal incinerator, for any successive 3-hour period of time, shall not be below the average temperature observed during the most recent emission test that demonstrated the emissions unit was in compliance. The combustion temperature of the Regenerative Thermal Oxidizer and the average temperature of the combustion chamber of the Regenerative Thermal Oxidizer shall be measured at the same location.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI# P0107000]

d) Monitoring and/or Recordkeeping Requirements

(1) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the material, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term: OAC rule 3745-77-07(C)(1), ORC 3704.03(F)(4)(b), OAC rule 3745 114 01, PTI# P0107000]

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the Regenerative Thermal Oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI# P0107000]

(3) The permittee shall collect and record the following Regenerative Thermal Oxidizer information for each operating day:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

b. all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was below the average temperature observed during the most

recent emission test that demonstrated that the emissions unit was in compliance; and

c. prior to the initial compliance demonstration, all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was less than 1400 degrees;

[Authority for term: OAC rule 3745-77-07(C)(1), PTI# P0107000]

e) Reporting Requirements

(1) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Title V Fee Emission Report to be submitted by April 15 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI# P0107000]

(2) The permittee shall submit deviation (excursion) reports which include the following information for the Regenerative Thermal Oxidizer:

a. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

b. an identification of all successive 3-hour periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed;

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1),PTI# P0107000]

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. Emissions Limitation: VOC emissions shall not exceed 6.26 tons per year.

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

b. Emissions Limitation: Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method:If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation: Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitations: VOC emissions shall not exceed 1.43 pounds per hour; Thepermittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

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

i. The emission testing shall be conducted approximately 2 and a half years after issuance of this permit and within 6 months prior to permit expiration.

ii. The following test method(s) shall be employed to determine the mass emission rate(s) for VOC and overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

vi. The test(s) shall be conducted while this emissions unit and P016 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

vii. The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the control efficiency tests specified above. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section F)1.d.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their

total concentration, and on a consideration of the potential presence of interfering gases.

viii. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

ix. Personnel from the Ohio EPA, Central District Office 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.

x. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Appendix A, PTI# P0107000]

g) Miscellaneous Requirements

(1) None.