



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-03557

Fac ID: 1318278206

DATE: 4/5/2005

CSA International
Robert DeRemer, P.E.
8501 East Pleasant Valley Dr.
Cleveland, OH 44131-5516

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

Sincerely,

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

CC: USEPA

CLAA



**Permit To Install
Terms and Conditions**

**Issue Date: 4/5/2005
Effective Date: 4/5/2005**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-03557

Application Number: 13-03557
Facility ID: 1318278206
Permit Fee: **\$400**
Name of Facility: CSA International
Person to Contact: Robert DeRemer, P.E.
Address: 8501 East Pleasant Valley Dr.
Cleveland, OH 44131-5516

Location of proposed air contaminant source(s) [emissions unit(s)]:
**8501 East Pleasant Valley Rd.
Cleveland, Ohio**

Description of proposed emissions unit(s):
P001 and P002, two separate natural gas fired water heater safety laboratory test cells.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

CSA International
PTI Application: 13-03557
Modification Issued: 4/5/2005

Facility ID: 1318278206

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of

CSA International**PTI Application: 13-03557****Modification Issued: 4/5/2005****Facility ID: 1318278206**

up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

CSA International
 PTI Application: 13-03557
 Modification Issued: 4/5/2005

Facility ID: 1318278206

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Total VOC	5.48

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Natural Gas Fired Water Heater Safety Certification Laboratory Test Cell #1 - VOCs from Spilled Gallon of Gasoline and Controlled by a Thermal Oxidizer.	OAC rule 3745-31-05(A)(3)	Operating Scenario One: Water Heater Passes Certification Test OC: 3 lb/hr 15 lb/day 2.74 tons/year PM: 5% opacity as a 6-minute average
Modified The terms and conditions in this permit supercede the terms and conditions contained in PTI 13-3557 issued on August 25, 1999.		Operating Scenario Two: Water Heater Fails Certification Test and Gasoline Vapors Deflagrate OC: 6.15 lb/hr 40 lb/day 2.74 tons/year PM: 5% opacity as a 6-minute average
	OAC rule 3745-21-07(G)(1) and (G)(2)	Compliance with the Air Toxics Policy Equivalent to OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)	Equivalent to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a** The permittee shall install and use a flame arrestor into the inlet of the thermal oxidizer.

- 2.b The thermal oxidizer process stream has been designed so that the hydrocarbon concentration at the inlet of the oxidizer does not exceed 25% of the lower explosive limits of the gasoline being processed, in accordance with NFPA standards. The permittee shall ensure that these levels are not exceeded at all times while the test cell is in operation.
- 2.c The permittee shall install and operate a flame ionization detector-type hydrocarbon analyzer (FIDHCA) to measure and record the hydrocarbon concentration inside of the test chamber during each test on a continuous basis.
- 2.d Provisions for Handling Sudden and Violent Ignition of Gasoline Vapors: There is a chance that the test may cause a sudden and violent ignition of gasoline vapors inside of the test chamber. The chamber should be designed to withstand such an ignition.

B. Operational Restrictions

1. The average combustion chamber temperature within the thermal incinerator, for any 35-minute block of time during the active venting and incineration phase of the certification of the test, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.
2. The permittee has requested to alternately operate the two test cells P001 and P002 and will use only one thermal incinerator for both units. Actual emission calculations shall be based on 24 hours per day and 365 days per year.
3. The permittee shall install an interlocking device which does not allow any test cell to startup or operate unless the thermal incinerator temperature is maintained at no less than the average temperature during which the most recent emissions test that demonstrated that the emissions unit was in compliance or at no less than 1400 degrees Fahrenheit.
4. The permittee shall install an interlocking device which will not permit the two test cells to operate simultaneously or which will not permit the two test cells to exhaust emissions of organic compounds to the thermal incinerator simultaneously unless, of course, the thermal incinerator is designed to incinerate organic compounds from the two test cells simultaneously.
5. Visible emissions from the stack of the thermal incinerator shall not exceed 5 percent opacity as a 6-minute average.
6. The permittee shall not operate the test cell without the benefit of the thermal oxidizer.

C. Monitoring and/or Recordkeeping Requirements

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion chamber temperature within the thermal incinerator 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. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

1. all 35-minute blocks of time during which the average combustion chamber temperature within the thermal incinerator, during the active venting and incineration phase of the certification test, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
2. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
3. the dates and periods of time the test cell was operated without the benefit of the thermal oxidizer;
4. the test periods of time and gasoline consumed per test and on a daily basis; and,
5. maintain mass balance records, estimated losses of OC emissions during the test and the number of failed units during the reporting period.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 35-minute blocks of time during which the average combustion chamber temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify all instances when the minimum temperature maintenance interlocking device allowed any test cell to startup or operate when the thermal incinerator combustion chamber temperature was below the minimum required temperature or 1,400 degrees Fahrenheit.
3. The permittee shall submit deviation (excursion) reports which identify all instances when the

Emissions Unit ID: P001

only-one-cell-at-a-time interlocking device allowed the two test cells to operate simultaneously unless, of course, the thermal incinerator is designed to incinerate organic compounds from the two test cells simultaneously.

4. The permittee shall submit deviation (excursion) reports which identify all instances when the test cell was operated without the benefit of the thermal oxidizer.
5. The permittee shall submit deviation (excursion) reports which identify all instances when the gasoline consumption exceeded the one gallon per 2-hour-test limit and the limits set by this permit.

E. Testing RequirementsEmission testing requirements

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

1. The emission testing shall be conducted within 90 days of startup.
2. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate(s) for OC.
3. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for OC, Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
4. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Emissions Unit ID: P001

Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation
OC: 3 lb/hr

Applicable Compliance Method

The limit is based upon usage of 1 gallon of gasoline per test, and capture and control by the incinerator. The records required to be kept shall be used to determine if the limit is met. The permittee shall demonstrate compliance with the above value(s) of OC/hour from thermal breakdown of the vapors of organic compounds by emission testing in accordance with Method 25 or 25A, 40 CFR Part 60, Appendix A.

2. Emission Limitation
OC: 15 lb/day

Applicable Compliance Method

To determine the actual worst case daily OC emissions rate, multiply the above actual hourly OC rate by the actual hours of operation per day.

3. Emission Limitation
OC: 2.74 tons/year

Applicable Compliance Method

Multiply the lb/day obtained above by 365 days per year and then multiplying this product by 1 ton/2000 pounds yields OC emissions in tons/year.

4. Emission Limitation
5 percent opacity

Applicable Compliance Method

The permittee shall demonstrate compliance with the 5 percent opacity limit in accordance with Reference Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60, "Standards of Performance for New Stationary Sources."

5. Emission Limitation
OC: 6.15 lb/hr

Applicable Compliance Method

The limit is based upon usage of 1 gallon of gasoline per test, and loss of the maximum amount of the gasoline.

Modification Issued: 4/5/2005

Beginning gasoline quantity (gallons) - Amount collected (gallons) = Usage (gallons)

Usage (gallons) * 6.15 (OC lbs/gallon) = OC emissions (lbs)

OC emissions (lbs) / Length of Test (hours) = Emission Rate (lbs/hour)

6. Emission Limitation

OC: 40 lb/day

Applicable Compliance Method

To determine the actual worst case daily OC emissions rate, adding the hourly emission rate for all the tests for this emissions unit for the day will yield the actual emission rate for the day.

7. Emission Limitation

OC: 2.74 tons/year

Applicable Compliance Method

To determine the actual worst case yearly OC emissions rate, adding the daily or monthly emission rate for all the tests for this emissions unit for the year will yield the actual emission rate for the year.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Natural Gas Fired Water Heater Safety Certification Laboratory Test Cell #2 - VOCs from Spilled Gallon of Gasoline and Controlled by a Thermal Oxidizer.	OAC rule 3745-31-05(A)(3)	Operating Scenario One: Water Heater Passes Certification Test OC: 3 lb/hr 15 lb/day 2.74 tons/year PM: 5% opacity as a 6-minute average
Modified	OAC rule 3745-21-07(G)(1) and (G)(2)	Operating Scenario Two: Water Heater Fails Certification Test and Gasoline Vapors Deflagrate OC: 6.15 lb/hr 40 lb/day 2.74 tons/year PM: 5% opacity as a 6-minute average
The terms and conditions in this permit supercede the terms and conditions contained in PTI 13-3557 issued on August 25, 1999.	OAC rule 3745-17-07(A)(1)	Compliance with the Air Toxics Policy Equivalent to OAC rule 3745-31-05(A)(3) Equivalent to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a** The permittee shall install and use a flame arrestor into the inlet of the thermal oxidizer.

Emissions Unit ID: **P002**

- 2.b** The thermal oxidizer process stream has been designed so that the hydrocarbon concentration at the inlet of the oxidizer does not exceed 25% of the lower explosive limits of the gasoline being processed, in accordance with NFPA standards. The permittee shall ensure that these levels are not exceeded at all times while the test cell is in operation.
- 2.c** The permittee shall install and operate a flame ionization detector-type hydrocarbon analyzer (FIDHCA) to measure and record the hydrocarbon concentration inside of the test chamber during each test on a continuous basis.
- 2.d** Provisions for Handling Sudden and Violent Ignition of Gasoline Vapors:
There is a chance that the test may cause a sudden and violent ignition of gasoline vapors inside of the test chamber. The chamber should be designed to withstand such an ignition.

B. Operational Restrictions

1. The average combustion chamber temperature within the thermal incinerator, for any 35-minute block of time during the active venting and incineration phase of the certification of the test, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.
2. The permittee has requested to alternately operate the two test cells P001 and P002 and will use only one thermal incinerator for both units. Actual emission calculations shall be based on 24 hours per day and 365 days per year.
3. The permittee shall install an interlocking device which does not allow any test cell to startup or operate unless the thermal incinerator temperature is maintained at no less than the average temperature during which the most recent emissions test that demonstrated that the emissions unit was in compliance or at no less than 1400 degrees Fahrenheit.
4. The permittee shall install an interlocking device which will not permit the two test cells to operate simultaneously or which will not permit the two test cells to exhaust emissions of organic compounds to the thermal incinerator simultaneously unless, of course, the thermal incinerator is designed to incinerate organic compounds from the two test cells simultaneously.
5. Visible emissions from the stack of the thermal incinerator shall not exceed 5 percent opacity as a 6-minute average.
6. The permittee shall not operate the test cell without the benefit of the thermal oxidizer.

C. Monitoring and/or Recordkeeping Requirements

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion chamber temperature within the thermal incinerator 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. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

1. all 35-minute blocks of time during which the average combustion chamber temperature within the thermal incinerator, during the active venting and incineration phase of the certification test, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
2. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
3. the dates and periods of time the test cell was operated without the benefit of the thermal oxidizer;
4. the test periods of time and gasoline consumed per test and on a daily basis; and,
5. maintain mass balance records, estimated losses of OC emissions during the test and the number of failed units during the reporting period.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 35-minute blocks of time during which the average combustion chamber temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify all instances when the minimum temperature maintenance interlocking device allowed any test cell to startup or operate when the thermal incinerator combustion chamber temperature was below the minimum required temperature or 1,400 degrees Fahrenheit.
3. The permittee shall submit deviation (excursion) reports which identify all instances when the only-one-cell-at-a-time interlocking device allowed the two test cells to operate simultaneously unless, of course, the thermal incinerator is designed to incinerate organic compounds from the

two test cells simultaneously.

4. The permittee shall submit deviation (excursion) reports which identify all instances when the test cell was operated without the benefit of the thermal oxidizer.
5. The permittee shall submit deviation (excursion) reports which identify all instances when the gasoline consumption exceeded the one gallon per 2-hour-test limit and the limits set by this permit.

E. Testing RequirementsEmission testing requirements

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

1. The emission testing shall be conducted within 90 days of startup.
2. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate(s) for OC.
3. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for OC, Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
4. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Modification Issued: 4/5/2005

Compliance with the emission limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation
OC: 3 lb/hr

Applicable Compliance Method

The limit is based upon usage of 1 gallon of gasoline per test, and capture and control by the incinerator. The records required to be kept shall be used to determine if the limit is met. The permittee shall demonstrate compliance with the above value(s) of OC/hour from thermal breakdown of the vapors of organic compounds by emission testing in accordance with Method 25 or 25A, 40 CFR Part 60, Appendix A.

2. Emission Limitation
OC: 15 lb/day

Applicable Compliance Method

To determine the actual worst case daily OC emissions rate, multiply the above actual hourly OC rate by the actual hours of operation per day.

3. Emission Limitation
OC: 2.74 tons/year

Applicable Compliance Method

Multiply the lb/day obtained above by 365 days per year and then multiplying this product by 1 ton/2000 pounds yields OC emissions in tons/year.

4. Emission Limitation
5 percent opacity

Applicable Compliance Method

The permittee shall demonstrate compliance with the 5 percent opacity limit in accordance with Reference Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60, "Standards of Performance for New Stationary Sources."

5. Emission Limitation
OC: 6.15 lb/hr

Applicable Compliance Method

The limit is based upon usage of 1 gallon of gasoline per test, and loss of the maximum amount of

the gasoline.

Beginning gasoline quantity (gallons) - Amount collected (gallons) = Usage (gallons)

Usage (gallons) * 6.15 (OC lbs/gallon) = OC emissions (lbs)

OC emissions (lbs) / Length of Test (hours) = Emission Rate (lbs/hour)

6. Emission Limitation

OC: 40 lb/day

Applicable Compliance Method

To determine the actual worst case daily OC emissions rate, adding the hourly emission rate for all the tests for this emissions unit for the day will yield the actual emission rate for the day.

7. Emission Limitation

OC: 2.74 tons/year

Applicable Compliance Method

To determine the actual worst case yearly OC emissions rate, adding the daily or monthly emission rate for all the tests for this emissions unit for the year will yield the actual emission rate for the year.

F. Miscellaneous Requirements

None