



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: 10/24/2006

CSA International
Robert DeRemer, P.E.
8501 East Pleasant Valley Dr.
Cleveland, OH 441315516

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 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: 10/24/2006
Effective Date: 10/24/2006**

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 441315516

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

Description of proposed emissions unit(s):
Administrative modification to P001 and P002 requested by facility.

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)

CSA International
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Modification Issued: 10/24/2006

Facility ID: 131827820

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

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	7.3

CSA International
PTI Application: 13-03557
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Facility ID: 131827820

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

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>
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)	OC: 6.15 lbs/hr and 40 lbs/day or 85% overall reduction 7.3 tons/year PM: Visible particulate emissions from the incinerator stack shall not exceed 5% opacity as a 6-minute average
Modified	OAC rule 3745-21-07 (G)(2)	Compliance with the Air Toxics Policy
The terms and conditions in this permit supercede the terms and conditions contained in PTI 13 -3557 issued on August 25, 1999 and modified on April 5, 2005.	OAC rule 3745-17-07(A)(1)	The requirements of these rules are equivalent to or less stringent than the requirements of OAC rule 3745-31-05(A)(3).
		The visible emission requirement of this rule is less

stringent than the requirements of OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The permittee shall install and use a flame arrester 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 when actively venting the test cell.
- 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 permittee shall install an interlocking device which does not allow any test cell to actively vent 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.
- 2. 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 the thermal incinerator is designed to incinerate organic compounds from the two test cells simultaneously.
- 3. The permittee shall not actively vent the test cell without the benefit of the thermal oxidizer.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall monitor and record the combustion chamber temperature within the thermal incinerator when the emissions unit is actively venting emissions. Units shall be in degrees Fahrenheit. The monitoring devices shall be capable of accurately measuring the desired parameter. The temperature monitor 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:

- a. the permittee shall maintain daily records of the afterburner combustion temperature, in degrees Fahrenheit when the test cell was actively venting;
- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was actively venting;
- c. the dates and periods of time the test cell was actively vented without the benefit of the thermal oxidizer;
- d. the test periods of time and gasoline consumed (i.e., amount used minus amount collected) per test and on a daily basis; and,
- e. maintain mass balance records of gasoline consumed, estimated losses of OC emissions determined in accordance with Sections E.2.b and c of this permit, and the number of failed units during the reporting period. The capture and control efficiency shall be determined from the most recent performance test that demonstrated compliance.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) which identify all instances when the minimum temperature maintenance interlocking device allowed any test cell to actively vent emissions when the thermal incinerator combustion chamber temperature was below the minimum required temperature or 1,400 degrees Fahrenheit.

Emissions Unit ID: P001

2. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ which identify all instances when the only-one-cell-at-a-time interlocking device allowed the two test cells to operate simultaneously unless the thermal incinerator is designed to incinerate organic compounds from the two test cells simultaneously.
3. The permittee shall submit quarterly deviation (excursion) reports which identify all instances when the test cell was actively vented without the benefit of the thermal oxidizer.
4. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that include the following information:
 - a. an identification of each hour during which the average controlled organic compound emissions from the gasoline usage exceeded 6.15 pounds per hour, and the actual average controlled organic compound emissions for each such hour; and
 - b. an identification of each day during which the controlled organic compound emissions from the gasoline usage exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day.

The above reporting elements are not required if the permittee demonstrates that the overall reduction of OC emissions is at least 85% or greater as demonstrated during the most recent performance test.

5. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 90 days of startup.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate(s) for OC.
 - c. 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.

- d . The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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.

2. 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):
- a . Emission Limitation
Visible particulate emissions from the incinerator stack shall not exceed 5 percent opacity as a 6-minute average.

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."

- b . Emission Limitation
 OC: 6.15 lbs/hr or 85% overall reduction

Applicable Compliance Method

The limit is based upon usage 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 and the following calculation:

$$\begin{aligned} & \text{Beginning gasoline quantity (lbs/test) - Amount collected (lbs/test)} \\ & = \text{Usage (lbs/test)} \\ & \text{Usage (lbs/test)) * [1 - (capture efficiency * control efficiency)] = OC}_{\text{emissions}} \\ & \text{(lbs/test)} \end{aligned}$$

$$\begin{aligned} & [\text{OC}_{\text{emissions}} \text{ (lbs/test) + OC}_{\text{emissions}} \text{ (lbs/test)...}] = \text{OC Emission Rate (lbs/day)} \\ & \text{OC emissions Rate (lbs/day) / Testing Duration (hours/day)} \\ & = \text{Average OC Emission Rate (lbs/hour)} \end{aligned}$$

Where:

n = OC emissions from each test performed during the day

where, the capture and control efficiencies are determined from the most recent stack test that demonstrated compliance with the allowable limit. The overall percent reduction is determined by multiplying the capture efficiency by the control efficiency of the incinerator.

The permittee shall demonstrate compliance with the above pounds OC/hour limit or the 85% overall reduction by emission testing in accordance with Method 25 or 25A, 40 CFR Part 60, Appendix A.

- c . Emission Limitation
 OC: 40 lbs/day or 85% overall reduction

CSA I**PTI A****Modification Issued: 10/24/2006**Emissions Unit ID: **P001****Applicable Compliance Method**

Compliance with the daily limitation shall be determined based on the record keeping and by summing the total gasoline usage per day and calculating emissions as follows:

Beginning gasoline quantity (lbs/test) - Amount collected (lbs/test)

= Usage (lbs/test)

Usage (lbs/test) * [1 - (capture efficiency * control efficiency)] = OC_{emissions} (lbs/test)

[OC_{emissions} (lbs/test) + OC_{emissions} (lbs/test)...] = OC Emissions Rate (lbs/day)

Where:

n = OC Emissions from each test performed during the day

where, the capture and control efficiencies are determined from the most recent stack test that demonstrated compliance with the allowable limit. The overall percent reduction is determined by multiplying the capture efficiency by the control efficiency of the incinerator.

- d . Emission Limitation
OC: 7.3 tons/year

Applicable Compliance Method

The ton/year limitation was developed by multiplying the daily limit by 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the daily limit compliance shall be assumed with the annual limit. To determine the actual yearly OC emissions rate, add the actual daily emission rate for all the tests for this emissions unit for the year and divide by 2000 lbs/ton.

F. Miscellaneous Requirements

None

CSA I

PTI A

Modification Issued: 10/24/2006

Emissions Unit ID: **P002**

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

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 #1 - VOCs from Spilled Gallon of Gasoline and Controlled by a Thermal Oxidizer.	OAC rule 3745-31-05(A)(3)	OC: 6.15 lbs/hr and 40 lbs/day or 85% overall reduction 7.3 tons/year PM: Visible particulate emissions from the incinerator stack shall not exceed 5% opacity as a 6-minute average
Modified	OAC rule 3745-21-07 (G)(2)	Compliance with the Air Toxics Policy
The terms and conditions in this permit supercede the terms and conditions contained in PTI 13 -3557 issued on August 25, 1999 and modified on April 5, 2005.	OAC rule 3745-17-07(A)(1)	The requirements of these rules are equivalent to or less stringent than the requirements of OAC rule 3745-31-05(A)(3).
		The visible emission requirement of this rule is less

stringent than the requirements of OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The permittee shall install and use a flame arrester 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 when actively venting the test cell.
- 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 permittee shall install an interlocking device which does not allow any test cell to actively vent 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.
- 2. 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 the thermal incinerator is designed to incinerate organic compounds from the two test cells simultaneously.
- 3. The permittee shall not actively vent the test cell without the benefit of the thermal oxidizer.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall monitor and record the combustion chamber temperature within the thermal incinerator when the emissions unit is actively venting emissions. Units shall be in degrees Fahrenheit. The monitoring devices shall be capable of accurately measuring the desired parameter. The temperature monitor 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:

- a. the permittee shall maintain daily records of the afterburner combustion temperature, in degrees Fahrenheit when the test cell was actively venting;
- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was actively venting;
- c. the dates and periods of time the test cell was actively vented without the benefit of the thermal oxidizer;
- d. the test periods of time and gasoline consumed (i.e., amount used minus amount collected) per test and on a daily basis; and,
- e. maintain mass balance records of gasoline consumed, estimated losses of OC emissions determined in accordance with Sections E.2.b and c of this permit, and the number of failed units during the reporting period. The capture and control efficiency shall be determined from the most recent performance test that demonstrated compliance.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) which identify all instances when the minimum temperature maintenance interlocking device allowed any test cell to actively vent emissions when the thermal incinerator combustion chamber temperature was below the minimum required temperature or 1,400 degrees Fahrenheit.
2. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ which identify all instances when the only-one-cell-at-a-time interlocking device allowed the two test cells to operate simultaneously unless the thermal incinerator is designed to incinerate organic compounds from the two test cells simultaneously.

3. The permittee shall submit quarterly deviation (excursion) reports which identify all instances when the test cell was actively vented without the benefit of the thermal oxidizer.
4. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that include the following information:
 - a. an identification of each hour during which the average controlled organic compound emissions from the gasoline usage exceeded 6.15 pounds per hour, and the actual average controlled organic compound emissions for each such hour; and
 - b. an identification of each day during which the controlled organic compound emissions from the gasoline usage exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day.

The above reporting elements are not required if the permittee demonstrates that the overall reduction of OC emissions is at least 85% or greater as demonstrated during the most recent performance test.

5. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 90 days of startup.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate(s) for OC.
 - c. 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.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate

CSA I**PTI A****Modification Issued: 10/24/2006**Emissions Unit ID: **P002**

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.

2. 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):
 - a . Emission Limitation
Visible particulate emissions from the incinerator stack shall not exceed 5 percent opacity as a 6-minute average.

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."
 - b . Emission Limitation
OC: 6.15 lbs/hr or 85% overall reduction

Applicable Compliance Method

The limit is based upon usage 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 and the following calculation:

$$\begin{aligned} & \text{Beginning gasoline quantity (lbs/test) - Amount collected (lbs/test)} \\ & = \text{Usage (lbs/test)} \\ & \text{Usage (lbs/test)) * [1 - (capture efficiency * control efficiency)] = OC}_{\text{emissions}} \\ & \text{(lbs/test)} \end{aligned}$$

$$\begin{aligned} & [\text{OC}_{\text{emissions}} \text{ (lbs/test) + OC}_{\text{emissions}} \text{ (lbs/test)...}] = \text{OC Emission Rate (lbs/day)} \\ & \text{OC}_{\text{emissions}} \text{ Rate (lbs/day) / Testing Duration (hours/day)} \\ & = \text{Average OC Emission Rate (lbs/hour)} \end{aligned}$$

Where:

n = OC emissions from each test performed during the day

where, the capture and control efficiencies are determined from the most recent stack test that demonstrated compliance with the allowable limit. The overall percent reduction is determined by multiplying the capture efficiency by the control efficiency of the incinerator.

The permittee shall demonstrate compliance with the above pounds OC/hour limit or the 85% overall reduction by emission testing in accordance with Method 25 or 25A, 40 CFR Part 60, Appendix A.

- c . Emission Limitation
 OC: 40 lbs/day or 85% overall reduction

CSA I

PTI A

Modification Issued: 10/24/2006

Emissions Unit ID: P002

Applicable Compliance Method

Compliance with the daily limitation shall be determined based on the record keeping and by summing the total gasoline usage per day and calculating emissions as follows:

Beginning gasoline quantity (lbs/test) - Amount collected (lbs/test)

= Usage (lbs/test)

Usage (lbs/test) * [1 - (capture efficiency * control efficiency)] = OC_{emissions} (lbs/test)

[OC_{emissions} (lbs/test) + OC_{emissions} (lbs/test)...] = OC Emissions Rate (lbs/day)

Where:

n = OC Emissions from each test performed during the day

where, the capture and control efficiencies are determined from the most recent stack test that demonstrated compliance with the allowable limit. The overall percent reduction is determined by multiplying the capture efficiency by the control efficiency of the incinerator.

- d . Emission Limitation
OC: 7.3 tons/year

Applicable Compliance Method

The ton/year limitation was developed by multiplying the daily limit by 365 days/year and dividing by 2000 lbs/ton. Therefore, provided compliance is maintained with the daily limit compliance shall be assumed with the annual limit. To determine the actual yearly OC emissions rate, add the actual daily emission rate for all the tests for this emissions unit for the year and divide by 2000 lbs/ton.

F. Miscellaneous Requirements

None