

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **13-04634**

**A. Source Description**

The UCAR Carbon Company Inc. has submitted a permit to install for a heated press that will be used to make carbon articles by heating and compressing a mixture of petroleum coke, coal tar pitch, graphite, sulfur, metal oxides and carbon fibers. The heated press will be vented to a baghouse dust collector and then an incinerator. UCAR Carbon Company Inc. and Advanced Energy Technology Inc. (1318458257) have been determined to be one facility based on Engineering guide #58 for purposes of evaluating PSD, NNSR, and Title V applicability. However, separate permits will be issued to each facility to establish clear responsibility for compliance with permit requirements.

**B. Facility Emissions and Attainment Status**

This facility (UCAR Carbon Company Inc. and Advanced Energy Technology Inc. combined) has the potential to emit uncontrolled PE, SO<sub>2</sub> and CO emissions in excess of 100 TPY and greater than 10 TPY single/ 25 TPY combined of HAP emissions which would result in Title V applicability. Cuyahoga County has attainment status for CO emissions and for SO<sub>2</sub> emissions. The facility has been operating under Engineering Guide # 61 which does not subject the facility to Title V permitting if the actual emissions do not exceed 20% of the Title V threshold. The Advanced Energy Technology Inc. facility was issued a Synthetic Minor PTI to restrict CO emissions to 92 tpy. The Advanced Energy Technology Inc. operation anticipates that actual emissions will eventually exceed the 20% cutoff for Title V. Consequently, both Advanced Energy Technology Inc. and UCAR Carbon Company Inc. are seeking Synthetic Minor and/or FESOP limits for all non-exempt emissions units in order to restrict potential to emit for the combined facility below the Title V thresholds.

**C. Source Emissions**

The proposed new emissions unit has the potential to emit more than 100 tons of SO<sub>2</sub> emissions and 10 tons of individual and 25 TPY of combined HAPs per year resulting in TV applicability. UCAR Carbon Company Inc. is a research and development facility which does not operate at maximum capacity 8760 hours per year. The actual operating time results in actual emissions much less than the potential to emit. The company has requested federally enforceable permit restrictions in a Synthetic Minor Permit to Install in order to avoid Title V.

**D. Conclusion**

Limiting the annual operating hours of this new source to 1,365 hours/year will restrict the SO<sub>2</sub> emissions to 24.0 TPY based on a rolling 12-month summation. Facility wide (UCAR Carbon Company Inc. and Advanced Energy Technology Inc.) HAPs emissions will also be restricted to less than 9.5 TPY individual and 24.5 TPY combined. The Advanced Energy Technology Inc. facility (1318458257) has a potential to emit of single HAP and combined HAP emissions of less than 0.5 tons per year. For the purposes of Title V applicability the emissions from both UCAR Carbon Company Inc. (1318453876) and Advanced Energy Technology Inc. (1318458257) shall be grouped together.

Therefore, the UCAR Carbon Company Inc. will not be subject to Title V permitting. Facility wide (UCAR Carbon Company Inc. and Advanced Energy Technology Inc.) CO emissions will be addressed in a FESOP to be processed at a later date.





**State of Ohio Environmental Protection Agency**  
**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL**  
**CUYAHOGA COUNTY**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 13-04634**  
**Fac ID: 1318453876**

**DATE: 7/3/2006**

**UCAR Carbon Company, Incorporated**  
**Vicki Vesel**  
**12900 Snow Road**  
**Parma, OH 44130**

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$200 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

CLAA

PA  
**CUYAHOGA COUNTY**

PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04634** FOR AN AIR CONTAMINANT SOURCE

**FOR UCAR Carbon Company, Incorporated**

On 7/3/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **UCAR Carbon Company, Incorporated**, located at **12900 Snow Road, Parma, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04634:

**Heated Press, dust collector, and incinerator -- P011.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install  
Terms and Conditions

Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance

**DRAFT PERMIT TO INSTALL 13-04634**

**Application Number:** 13-04634  
**Facility ID:** 1318453876  
**Permit Fee:** To be entered upon final issuance  
**Name of Facility:** UCAR Carbon Company, Incorporated  
**Person to Contact:** Vicki Vesel  
**Address:** 12900 Snow Road  
Parma, OH 44130

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**12900 Snow Road**  
**Parma, Ohio**

Description of proposed emissions unit(s):  
**Heated Press, dust collector, and incinerator -- P011.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**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

**UCAR Carbon Company, Incorporated**

**Facility ID: 1318453876**

**PTI Application: 13-04634**

**Issued: To be entered upon final issuance**

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 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.

**UCAR Carbon Company, Incorporated**  
**PTI Application: 13-04634**  
**Issued: To be entered upon final issuance**

**Facility ID: 1318453876**

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.

**UCAR Carbon Company, Incorporated**

**Facility ID: 1318453876**

**PTI Application: 13-04634**

**Issued: To be entered upon final issuance**

**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>
PE	0.68
SO <sub>2</sub>	24.0
CO	1.29
VOC	0.14
NO <sub>x</sub>	0.80
* single HAP	9.0
* combined HAPS	24.0

**\* UCAR Carbon Company permit restriction.**

**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>
P011 - Heated press manufacturing carbon articles equipped with a fabric filter baghouse followed by a thermal incinerator	OAC rule 3745-31-05(A)(3)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 35.2 pounds per hour.
		Carbon monoxide (CO) emissions shall not exceed 1.89 pounds per hour.
		Volatile Organic Compounds (VOC) shall not exceed 0.20 pounds per hour.
		Nitrogen oxide (NO <sub>x</sub> ) emissions shall not exceed 1.18 pounds per hour.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with OAC rules 3745-17-07(A), 3745-17-11 and 3745-31-05(C).
	OAC rule 3745-17-11 Table 1	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	Particulate emissions (PE/PM <sub>10</sub> ) shall not exceed 0.99 pounds per hour.
		24.0 TPY of SO <sub>2</sub> emissions as a rolling, 12-month summation.

**UCAF****PTI A**

Emissions Unit ID: P011

**Issued: To be entered upon final issuance**

1.29 TPY of CO emissions as a rolling, 12-month summation.

0.14 TPY of VOC emissions as a rolling, 12-month summation.

0.80 TPY of NO<sub>x</sub> emissions as a rolling, 12-month summation.

0.68 TPY of PE/PM<sub>10</sub> emissions as a rolling, 12-month summation.

See section A.2.a.

## **2. Additional Terms and Conditions**

**2.a** The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units at the UCAR Carbon Company Inc., (see section A.2.b) shall not exceed 9.0 tons/year for any individual HAP or 24.0 tons/year for a combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation of emissions for this emissions unit plus the annual HAP contribution from the other emissions units at UCAR Carbon Company Inc. See Section F.1.

**2.b** The following list of emissions units at UCAR Carbon Company Inc. (1318453876) emit HAPs:

B004, B014, P001, P005, P009, P011

P001 - which contains the following processes:

GE #15, Trent #13, (6) pot furnaces, (6) muffle furnaces and (2) pitch impregnator vents

(14) 0.165 - 1.875 mmBtu/hr natural gas fired space heaters

(3) 0.28 - 2.63 mmBtu/hr natural gas fired boilers

(1) 0.27 mmBtu/hr natural gas fired hot water heater

335 HP emergency generator

Greives 0.175 mmBtu/hr natural gas fired drying oven

maintenance welding hoods

small heated BP press

lab equipment and lab hoods

bench scale exfoliation furnace

## **B. Operational Restrictions**

**UCAF  
PTI A**

Emissions Unit ID: P011

**Issued: To be entered upon final issuance**

1. The permittee shall operate a thermal incinerator whenever this emissions unit is in operation\*.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation\*, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.
3. The permittee shall operate a fabric filter baghouse whenever this emissions unit is in operation\*.
4. The maximum annual operating hours for this emissions unit shall not exceed 1,365 hours, based upon a rolling, 12-month summation of the operating hours based on operation\*.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

Month	Maximum Allowable Cumulative Hours of Operation
1	113
1-2	227
1-3	341
1-4	455
1-5	568
1-6	682
1-7	796
1-8	910
1-9	1,023
1-10	1,137
1-11	1,251
1-12	1,365

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the hours of operation for this emissions unit.

the press is actively emitting. Preheating of the press and incinerator is not considered operation.

**Monitoring and/or Recordkeeping Requirements**

Emissions Unit ID: P011

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation\*. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal incinerator, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:

- a. all 3-hour blocks of time, when the emissions unit was in operation\*, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
- b. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment when the associated emissions unit was in operation\*.

These records shall be maintained at the facility for a period of three years.

2. The permittee shall install, operate and maintain equipment to monitor the pressure drop across the fabric filter baghouse while the emissions unit is in operation\*. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter baghouse on a once per shift basis while the emissions unit is in operation\* and note whether the pressure drop is within the manufacturer's recommended range.
3. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the number of hours the source was in operation\* for each month; and
  - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the number of hours the source was in operation\*.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative number of hours the number of hours the source was in operation\* for each calendar month.

4. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the quantity of mix processed in the emissions unit in pounds;
  - b. the quantity of pitch in each mix processed in pounds and the quantity of added sulfur in

Emissions Unit ID: P011

- each mix in pounds;
- c. the total of each individual HAP emissions from the emissions unit in pounds or tons per month. Individual HAP Emissions calculated as follows: Total tons of Individual HAP Emission/month = summation (pounds of ingredients in each batch mix) x (emission factor lbs individual HAP emission/lbs ingredients) x (% pitch in batch/12.5 % pitch basis of emission factor) x (1-(control device efficiency/100)) x (1 ton/2000 lbs). Where the emission factors are 0.01624 lbs POM/lbs ingredients, 0.01183 lbs Carbonyl Sulfide/lbs ingredients but only for mixes with excess sulfur added, 0.00205 lbs Carbon Disulfide/lb ingredients but only for mixes with excess sulfur added. The emission factors shall be updated based on the results of any new emissions data or stack testing data obtained for this emissions unit and its emissions controls;
  - d. the total combined HAP emissions from the emissions unit in pounds or tons per month [the sum of (c) for all individual HAPs];
  - e. the updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months and include the contribution from all other emissions units as determined from F.1 below. For the first twelve months following the issuance of this permit, this shall be a cumulative total for all months since the issuance of the PTI; and
  - f. the updated rolling, 12-month summation of emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months and include the contribution from all other emissions units as determined from F.1 below. For the first twelve months following the issuance of this permit, this shall be a cumulative total for all months since the issuance of the PTI.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (Cleveland DAQ) contact. This information does not have to be kept on an individual emission unit basis.

\* Note: Operation is defined as when the press is actively emitting. Preheating of the press and incinerator is not considered operation.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly summaries of the records to the Cleveland DAQ which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance and/or any records of downtime for the capture (collection) system, the thermal incinerator, or the monitoring equipment when the emissions unit was in operation\*. 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.
2. The permittee shall submit quarterly summaries of the records to the Cleveland DAQ which identify each day and time during which the pressure drop across the baghouse was outside the manufacturer's recommended operating range, and/or any records of downtime for the capture

**Issued: To be entered upon final issuance**

(collection) system, the thermal incinerator, or the monitoring equipment when the emissions unit was in operation\*. 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.

3. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ which identify all exceedances of the rolling, 12-month limitation on the hours of operation\*; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation\*. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
4. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ which identify all exceedances of the rolling, 12-month individual HAP emission limitation and/or 12-month combined HAPs emission limitation and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative HAPs emissions. These reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions, Section A of this permit.

\* Note: Operation is defined as when the press is actively emitting. Preheating of the press and incinerator is not considered operation.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 35.2 pounds per hour.  
  
Applicable Compliance Method:  
Compliance shall be determined using U.S. EPA test methods 1-4 and 6 of 40 CFR Part 60 Appendix A.
  - b. Emission Limitation:  
Carbon monoxide (CO) emissions shall not exceed 1.89 pounds per hour.  
  
Applicable Compliance Method:  
Compliance shall be determined using U.S. EPA test methods 1-4 and 10 of 40 CFR Part 60 Appendix A.
  - c. Emission Limitation:

Emissions Unit ID: P011

Volatile Organic Compounds (VOC) shall not exceed 0.20 pound per hour.

Applicable Compliance Method:

Compliance shall be determined using U.S. EPA test method 18, 25 or 25A of 40 CFR Part 60 Appendix A.

d. Emission Limitation:

Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 1.18 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined using U.S. EPA test method 7 of 40 CFR Part 60 Appendix A.

e. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average.

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).

f. Emission Limitation:

Particulate emissions (PE/PM<sub>10</sub>) shall not exceed 0.99 pound per hour.

Applicable Compliance Method:

Compliance shall be determined using U.S. EPA test methods 1-5 of 40 CFR Part 60 Appendix A.

g. Emission Limitation:

24.0 TPY of sulfur dioxide (SO<sub>2</sub>) emissions as a rolling, 12-month summation.

1.29 TPY of carbon monoxide (CO) emissions as a rolling, 12-month summation.

0.14 TPY Volatile Organic Compounds (VOC) emissions as a rolling, 12-month summation.

0.80 TPY Nitrogen oxide (NO<sub>x</sub>) emissions as a rolling, 12-month summation.

0.68 TPY of particulate (PE/PM<sub>10</sub>) emissions as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual limits shall be determined by multiplying the hourly emission rate for each pollutant determined from the performance test required in section E.2 below by the actual annual hours of operation\*, based on the recordkeeping requirement in section C.3, and the factor (1 ton/2,000 lbs).



**Issued: To be entered upon final issuance**

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 Cleveland DAQ's refusal to accept the results of the emission test(s).

- f. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ 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 Cleveland DAQ.

\*Note: Operation is defined as when the press is actively emitting. Preheating of the press and incinerator is not considered operation.

**F. Miscellaneous Requirements**

1. Since UCAR Carbon Company Inc. is a research and development facility they have numerous small emission sources. Many of these sources would be extremely difficult to track on a monthly basis because of the changing nature of R&D work. Many of these small sources do not operate on a routine basis. Tracking monthly emissions from such small sources for a rolling 12-month average given the nature of the operations is not possible. UCAR Carbon Company Inc. shall continue to perform an annual analysis for HAP emissions for these emissions units. This will be done as part of the evaluation for the fee emission report. At that time emissions from these units will be estimated and added to all other emissions units and this contribution shall be added to the total HAP determination for this emissions unit as determined in Section C.4.
2. The following special terms and conditions of this permit are federally enforceable: A - E.
3. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists'

**UCAR Carbon Company, Incorporated**

**PTI Application: 13-04624**

**Issue**

**Facility ID: 1318453876**

Emissions Unit ID: P011

(ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.