



7/28/2014

Mr. Trevor Violet
Joint Systems Manufacturing Center
1161 Buckeye Road
Lima, OH 45804

Certified Mail

Facility ID: 0302020027
Permit Number: P0116413
County: Allen

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 6/13/2014. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northwest District Office



Response to Comments

Facility ID:	0302020027
Facility Name:	Joint Systems Manufacturing Center
Facility Description:	Tanks and Tank Components
Facility Address:	1155 Buckeye Road Lima, OH 45804-1825 Allen County
Permit:	P0116413, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Lima News on 06/17/2014. The comment period ended on 07/17/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

Topic: Statement of Basis

Comment #1: Section A, Page 2 of Statement of Basis - On the third line of this page the units listed include P001 when it should be P011

Response #1: The Statement of Basis is only issued with the draft Title V permit renewal. Ohio EPA understands this was a typographical error, and the company's comment documents this error.

Comment #2: Section C, Page 4 of Statement of Basis - For emissions unit B003 the requirement "ET - stack testing during the last 6 months of the permit term....." should be removed

Response #2: The Statement of Basis is only issued with the draft Title V permit renewal. The permit no longer contains the requirement to conduct a stack test for B003, and the company's comments document Ohio EPA's concurrence that testing is not required.

Comment #3: For emissions unit B005 & B006 the requirement "ET - stack testing required twice during permit term....." does not match the requirement in the permit - "The emission testing shall be conducted within 2 ½ years after issuance of this permit..."



Response #3: The Statement of Basis is only issued with the draft Title V permit renewal. The permit terms for B005 and B006 contain the requirement to conduct a stack test only one time during the five year permit effective period (two and one-half years after issuance of the permit), thus, the company's comments document Ohio EPA's concurrence that testing is required one time during the five year permit effective period.

Topic: Table of Contents

Comment #1: Section C.14 of the Table of Contents: The Emissions units are not included in the Nomenclature. For consistency, C.14 should read: *Air Arcing Units, Group #1: P036, P037.*

Response #1: The equipment description was revised in the heading for Section C.14. Since the Table of Contents is automatically generated when the permit is printed, the equipment description will automatically then be updated.

Comment #2: Section C.15 of the Table of Contents: One of the Emissions units is included at the beginning of the Nomenclature. For consistency, C.15 should read: *Air Arcing Units, Group #2: P038, P039.*

Response #2: The equipment description was revised in the heading for Section C.15. Since the Table of Contents is automatically generated when the permit is printed, the equipment description will automatically then be updated.

Comment #3: Section C.17 of the Table of Contents: For consistency, the nomenclature should include the emissions units and should read: *Emissions Unit Group - Paint Booths: R001, R002.*

Response #3: The equipment description was revised in the heading for Section C.17. Since the Table of Contents is automatically generated when the permit is printed, the equipment description will automatically then be updated.

Topic: Revisions and Clarifications needed for Facility-Wide Terms and Conditions

Comment #1: Term B.2., emissions unit B011, page 18: B011 had been identified as Z007 in the previous permit: P0106774. Is this unit being re-identified? In addition, the input heat for this unit is 6.357 mmBTU/hr, not 3.357 mmBTU/hr as indicated in the draft permit.

Response #1: Ohio EPA no longer uses "Z" source designations for emissions units, and changed the unit identification to B011. The heat input for B011 was revised to the proper value of 6.357 mmBtu/hr.

Comment #2: Term B.2., emissions unit B012, page 18: B012 had been identified as Z008 in the previous permit: P0106774. Is this unit being re-identified? In addition, the input heat for this unit is 6.357 mmBTU/hr, not 3.357 mmBTU/hr as indicated in the draft permit.

Response #2: Ohio EPA no longer uses "Z" source designations for emissions units, and changed the unit identification to B012. The heat input for B012 was revised to the proper value of 6.357 mmBtu/hr.

Comment #3: Term B.2., emissions unit B013, page 18: B013 had been identified as Z009 in the previous permit: P0106774. Is this unit being re-identified? In addition, the input heat for this unit is 6.357 mmBTU/hr, not 3.357 mmBTU/hr as indicated in the draft permit.



Response #3: Ohio EPA no longer uses “Z” source designations for emissions units, and changed the unit identification to B013. The heat input for B013 was revised to the proper value of 6.357 mmBtu/hr.

Comment #4: Term B.4., emissions unit P801, page 18: In the list of exempt units, the unit identified as P801 had been identified as Z097 in the previous permit: P0106774.

Response #4: Ohio EPA no longer uses “Z” source designations for emissions units, and changed the unit identification to P801.

Topic: Revisions and Clarifications needed for Emissions Unit Terms and Conditions

Comment #1: Term C.1.d)(9), emissions unit B003, page 26: The previous permit: P0106774 did not require the coal samples to be composited at the end of the month. This is not our current practice. Is this a requirement of OAC rule 3745-77-07(C)(1)?

Response #1: This is not a requirement of OAC rule 3745-77-07(C)(1). Ohio EPA is not requiring composite coal sampling, as an incorrect permit term had been erroneously copied from another permit template. The correct, original permit term from the previously issued permit P0106774 was placed back into the permit.

Comment #2: Term C.5.d)(1), emissions unit P002, page 49: In a March 19, 2014 email from Andrea Moore, Ohio EPA-NWDO, Ms. Moore indicated that the permittee would have the opportunity to “consider changing the parametric monitoring for any non-CAM emissions units from baghouse pressure drop readings to daily VE check for consistency purposes.” In response, a March 25, 2014 email from Eric Tabor (a consultant acting as a representative of the permittee) to Andrea Moore, Jeff Skeebea and Julie McCarthy, all of the Ohio EPA-NWDO, indicated a desire to replace the differential pressure monitoring requirement with visible emission checks for P002. This change has not been made in the draft permit.

Response #2: Ohio EPA concurs with the permit applicant, and deleted all references to differential pressure drop monitoring, and added daily visible emissions checks requirements.

Comment #3: Term C.9.d)(1), emissions unit P017, page 66: In a March 19, 2014 email from Andrea Moore, Ohio EPA-NWDO, Ms. Moore indicated that the permittee would have the opportunity to “consider changing the parametric monitoring for any non-CAM emissions units from baghouse pressure drop readings to daily VE check for consistency purposes.” In response, a March 25, 2014 email from Eric Tabor (a consultant acting as a representative of the permittee) to Andrea Moore, Jeff Skeebea and Julie McCarthy, all of the Ohio EPA-NWDO, indicated a desire to replace the differential pressure monitoring requirement with visible emission checks for P017. It appears that the visible emission check was added in paragraph C.9.d)(2), but the pressure differential monitoring has not been removed.

Response #3: Ohio EPA concurs with the permit applicant, and deleted all references to differential pressure drop monitoring, and added daily visible emissions checks requirements. In addition, streamlining language was added for clarification.

Comment #4: Term C.9.e)(1), emissions unit P017, page 67: The quarterly reporting requirements refer to the pressure differential monitoring results and should be replaced by visible emission monitoring results.



Response #4: Ohio EPA concurs with the permit applicant, and deleted all references to differential pressure drop monitoring results, and added visible emissions checks reporting requirements.

Comment #5: Term C.15.e)(2), emissions units P038 and P039, page 95: The unit is incorrectly identified as "Block 3". Air Arcing Units, Group #2 are associated with "Block 4".

Response #5: Ohio EPA concurs with the permit applicant, and changed the description to "Block 4".

Comment #6: Term C.16.d)(9), emissions units B005 and B006, page 102: The previous permit: P0106774 did not require the coal samples to be composited at the end of the month. This is not our current practice. Is this a requirement of OAC rule 3745-77-07(C)(1)?

Response #6: This is not a requirement of OAC rule 3745-77-07(C)(1). Ohio EPA is not requiring composite coal sampling, as an incorrect permit term had been erroneously copied from another permit template. The correct, original permit term from the previously issued permit P0106774 was placed back into the permit.

Comment #7: Term C.17.f)(1)a., emissions units R001 and R002, page 115: In the Applicable Compliance Method paragraph, there is an asterisk after potential to emit. In the previous permit, there was an asterisk in the comparable section for each paint booth (R001, R002) that further described how the potential to emit was determined, but in this draft the asterisk does not refer to any additional content.

Response #7: The potential to emit language (emissions calculations basis) was inadvertently deleted when preparing the draft permit. The language was placed back into the permit from PTI No. P0103887.

Comment #8: Additional comment (general question): Why do emission units P008, P017, P028 & P029 require only three items to note if there are visible emissions observed (pp. 54, 67, 122) while emissions units P011, P014, P017, P020 & P023 (pp. 58, 62, 71, 75, 79) require five items to note if there are visible emissions?

Response #8: Emissions units P008, P017, P028 and P029 each have a zero percent opacity restriction, thus, only require the three item monitoring term. Emissions units P011, P014, P017, P020 and P023 have a 20 percent opacity restriction, thus require the five item monitoring term.



PRELIMINARY PROPOSED

**Division of Air Pollution Control
Title V Permit
for
Joint Systems Manufacturing Center**

Facility ID:	0302020027
Permit Number:	P0116413
Permit Type:	Renewal
Issued:	7/28/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Joint Systems Manufacturing Center

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans	7
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	9
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies.....	11
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	20
1. B003, Coal Fired Boiler #4	21
2. B007, Nat. Gas Boiler #7	33
3. F002, Miscellaneous Welding/Grinding	36
4. K006, EFV & Cougar Paint Line	38
5. P002, Shotblast SB-5.....	47
6. P008, Shotblast SB-6.....	52
7. P011, Shotblast SB-7.....	56
8. P014, Shotblast SB-8.....	60
9. P017, Pneumatic Ash Convey System.....	64
10. P019, Shotblast SB-9.....	68
11. P020, Shotblast SB-10.....	72
12. P023, Shotblast Media Airwash SB-5.....	76
13. P024, Engine Hot Testing	80
14. Emissions Unit Group -Air Arcing Units, Group #1: P036, P037	84
15. Emissions Unit Group -Air Arcing Units, Group #2: P038, P039	90
16. Emissions Unit Group - Boilers 5 & 6: B005,B006.....	95
17. Emissions Unit Group - Paint Booths: R001, R002.....	109
18. Emissions Unit Group - Paint lines: K002,K003.....	115
19. Emissions Unit Group - SB13 & 14: P028,P029.....	119
20. Emissions Unit Group - Structures paint lines: K001,K004.....	123



Authorization

Facility ID: 0302020027
Facility Description: Tanks and Tank Components
Application Number(s): A0049680
Permit Number: P0116413
Permit Description: Renewal Title V operating permit for a tanks and tank components manufacturing facility.
Permit Type: Renewal
Issue Date: 7/28/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0106774

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

Joint Systems Manufacturing Center
1155 Buckeye Road
Lima, OH 45804-1825

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



c) The permittee shall submit required reports in the following manner:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))



4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.



- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.



This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

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

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified Permit to Install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a Permit to Install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and 3745-31:

P013	Laser Cutting of GRP (PTI No. 03-1547)
P016	Portable Arc Welders and Grinders (PTI No. 03-1539)
P025	Air Make-Up Unit Heater for Paint Spray Booth PA-1 (PTI No. 03-13949)
P026	Air Make-Up Unit Heater for Paint Spray Booth PA-2 (PTI No. 03-13949)
P030	Emergency Generator (diesel, 68 hp)
P031	Emergency Generator (diesel, 133 hp)
P032	Emergency Generator (diesel, 250 hp)
P033	Emergency Generator (diesel, 250 hp)
P034	Emergency Fire Water Pump (diesel, 99 hp)
P035	Emergency Fire Water Pump (diesel, 188 hp)
P040	De-Milling Operation (PTI No. P0104852)
B011	Air Make Up Heater PA-10 (6.357 mmBtu/hr natural gas fired)
B012	Air Make Up Heater PA-11(6.357 mmBtu/hr natural gas fired)
B013	Air Make Up Heater PA-12 (6.357 mmBtu/hr natural gas fired)

[OAC rule 3745-77-07(A)(13)]

3. Pursuant to 40 CFR, Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units B003, B005, B006, P008, P011, P014, P019, P020, P023, P028 and P029 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

[Authority for term: 40 CFR, Part 64]

4. For emissions units K001, K002, K003, K004, K006, R001, R002 and P801, the facility is exempt from the Miscellaneous Metal Parts MACT, Subpart M MMM, because the Lima facility is owned by the U.S. Department of Defense/U.S. Army (and is operated by General Dynamics Land Systems, a private company), per 40 CFR 63.3881(c)(4).
5. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers located at a major source of hazardous air pollutants (HAP). The permittee shall comply with the requirements and limits of this NESHAP for the facility's new (commenced construction after 6/4/10) boilers by January 31, 2013, or upon startup, whichever is later; and the facility's existing boilers shall be in compliance with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016.



The following emissions units in this permit are subject to the aforementioned requirements: B003, B005, B006 and B007. [40 CFR Part 63]

6. The following boiler is designed to only burn gas 1 fuels (subcategory) and therefore is not subject to the emission limits in Table 2 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler is subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and the existing boilers must be included in the one-time energy assessment, performed in accordance with Table 3 #4 of the subpart. The permittee must demonstrate compliance no later than January 31, 2016:

B007 -73 mmBtu/hr natural gas fired boiler.

[40 CFR Part 63 Subpart DDDDD]

7. The Ohio EPA has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units B003, B005, and B006. The permittee shall comply with the provisions of the plan (as specified in Part C – Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions units.

Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart DDDDD after the compliance date in that rule. [40 CFR Part 64]



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

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C. Emissions Unit Terms and Conditions



1. B003, Coal Fired Boiler #4

Operations, Property and/or Equipment Description:

67.40 mmBtu/hour Coal-Fired Boiler with Baghouse

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity as six-minute average, except as provided by rule
b.	OAC rule 3745-17-10(C)(1)	0.225 lb of PE/mmBtu of actual heat input
c.	OAC rule 3745-18-08(l)	4.50 lbs of sulfur dioxide (SO ₂)/mmBtu of actual heat input
d.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See sections d) and e)
e.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 et seq.) [In accordance with 40 CFR 63.7499 this emissions unit is a pulverized coal/solid fossil fuel fired unit required to meet the subcategories of solid fuel, coal/solid fossil fuel and pulverized coal/solid fuel in Table 2 of this subpart.]	The emissions from the boiler(s) shall not exceed the following emission limitations, as identified in the most recent amendment to 40 CFR Part 63, Subpart DDDDD, and as identified in: Table 2 for existing units: 4.0E ⁻⁰² lb of filterable particulate matter (PM)/MMBtu of heat input; or 5.3E ⁻⁰⁵ lb of Total Selected Metals (TSM)/MMBtu of heat input; and 2.2E ⁻⁰² lb of hydrogen chloride (HCl)/MMBtu of heat input; and 5.7E ⁻⁰⁶ lb of mercury (Hg)/MMBtu of heat input; and 130 ppm carbon monoxide (CO) by volume on a dry basis, corrected to 3%



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>O₂, 3-run average; or</p> <p>if using CEMS:</p> <p>320 ppm carbon monoxide (CO) by volume on a dry basis, corrected to 3% O₂, as a 30-day rolling average.</p> <p>OR output limits (option)</p> <p>4.2E⁻⁰² lb of PM/MMBtu of steam output; or</p> <p>4.9E⁻⁰¹ lb of PM/MWh; or</p> <p>5.6E⁻⁰⁵ lb of TSM/ MMBtu of steam output; or</p> <p>6.5E⁻⁰⁴ lb of TSM/MWh; and</p> <p>2.5E⁻⁰² lb of hydrogen chloride (HCl)/MMBtu of steam output; or</p> <p>0.27 lb HCl/MWh; and</p> <p>6.4E⁻⁰⁶ lb of mercury (Hg)/MMBtu of steam output; or</p> <p>7.3E⁻⁰⁵ lb Hg/MWh; and</p> <p>0.11 lb CO/MMBtu of steam output, 3-run average; or</p> <p>1.4 lb CO/MWh, 3-run average</p> <p>Boilers subject to emission standards in Table 2 shall also meet the work practice standards identified in Table 3 during startup and shutdown of the unit and the tune-up requirements, as applicable, in Table 3.</p> <p>The permittee shall demonstrate compliance with the limits published in the final amendments to Subpart DDDDD, as required by the subpart.</p>

(2) Additional Terms and Conditions

- a. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1. The plan shall include, at a minimum,



procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

- b. The permittee shall comply with the applicable additional terms and conditions required under 40 CFR Part 63 Subpart DDDDD, including the following sections no later than January 31, 2016:

Applicable Rule	Requirement
40 CFR 63.7505	General requirements
40 CFR 63.7521	Fuel analyses, fuel specifications and procedures
40 CFR 63.7500	emission limits identified in Table 1 or 2; work practice standard in Tables 3; and operating limits in Table 4 to the subpart
40 CFR 63.7510	Initial compliance requirements
40 CFR 63.7530	Method(s) to demonstrate initial compliance with emission limitations, fuel specifications and work practice standards
40 CFR 63.7540	Method(s) to demonstrate continuous compliance with emission limitations, fuel specifications and work practice standards
40 CFR Part 63, Subpart DDDDD Table 10	The applicability of the General Provision in Part 63 Subpart A to boilers subject to Subpart DDDDD are identified in Table 10 to the subpart.

c) Operational Restrictions

- (1) The quality of each shipment of coal received for burning in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable limitation specified in b)(1) above.

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

- (2) The permittee shall comply with the operational restrictions under 40 CFR Part 63 Subpart DDDDD, including the following sections no later than January 31, 2016:

Applicable Rule	Requirement
40 CFR 63.7525	Monitoring, installation, operation and maintenance requirements
40 CFR 63.7515	Subsequent performance tests, fuel analyses, or



	tune-ups
40 CFR 63.7520	Stack test and procedures to use
40 CFR 63.7500(a)(3)	The boiler and associated air pollution control and monitoring equipment must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart DDDDD]

d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit, until the compliance date in 40 CFR Part 63, Subpart DDDDD, is the opacity of the visible particulate emissions from the exhaust stack. The appropriate range of opacity defining proper function of the baghouse is an opacity less than 20%, as a six-minute average, except as otherwise provided by OAC rule 3745-17-07(A)(1)(b), (A)(2) and (A)(3).

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) The permittee shall operate and maintain a continuous opacity monitoring system (COMS) to continuously monitor and record the opacity of the particulate emissions from this emissions unit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

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

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
- d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
- f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).



The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system that has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Northwest District Office upon request.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (3) Upon detecting an excursion or exceedance, the permittee shall restore operation of the emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown, or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of the excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) At all times, permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (6) The permittee shall monitor indicators to detect any bypass of the control device (or capture system) to the atmosphere.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (7) The permittee has developed an inspection and maintenance program for the baghouse as indicated below. At a minimum, the following shall be conducted:

- a. At least once every month, the permittee shall:
 - i. Check the bags/filters for deterioration or degradation;
 - ii. Check the cleaning system for proper operation; and



- iii. Check the hoppers and conveyance systems for proper operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (8) To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor that measures the temperature of the boiler exhaust gases entering the baghouse (a) during all periods of startup until the baghouse is operational or until the inlet temperature of the baghouse achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) during all periods of shutdown until the inlet temperature of the baghouse drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hard copy record of the temperatures during periods of startup and shutdown shall be maintained.

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, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in degrees Fahrenheit.

[OAC rules 3745-77-07(C)(1), 3745-17-07(A)(3)(a)(i) and 3745-17-07(A)(3)(b)(i)]

- (9) The permittee shall collect a representative grab sample from each shipment of coal as received. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal.

Each sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the Director (the Ohio EPA, Northwest District Office).

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

- (10) The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated SO₂ emission rate, in lbs/mmBtu, for each shipment of coal during a calendar month.

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

- (11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements under 40 CFR Part 63 Subpart DDDDD, including the following sections no later than January 31, 2016:



Applicable Rule	Requirement
40 CFR 63.7555; 40 CFR 63.7560; and 40 CFR 63.10(b)	The records required by the NESHAP are identified in 40 CFR 63.7555 and they must be kept for at least 5 years following the date of the record or report submitted.
40 CFR 63.7540(a)(2); and 40 CFR 63.7550(c)(4)	Records must be kept of the type and amount of all fuels burned in each boiler during each reporting period, in order to demonstrate that all fuel burned in each unit would either: result in lower emissions of HCl, Hg, or TSM than the applicable emission limit (if demonstrating compliance through fuel analyses) or result in a lower fuel input of Cl, Hg, or TSM than the maximum values calculated during the last performance test (if demonstrating compliance through performance testing).
40 CFR 63.7535	In order to demonstrate continuous compliance with the requirements of the NESHAP, the required monitoring and data collection systems must be operated at all times the affected source is in operation, except for periods of monitoring system malfunction, out of control periods, and required monitoring system quality assurance and/or control activities.
40 CFR 63.7533	If complying with the alternative equivalent steam output-based emission limits, instead of the heat input-based limits in Tables 1 or 2 to the subpart, the owner/operator may take credit for implementing energy conservation measures identified in the energy assessment by establishing a benchmark from which emission reduction credits may be generated. The requirements for documenting and calculating the differences between the established benchmark and reductions from energy conservation are identified in this section.
40 CFR 63.7541	Following the compliance date for existing sources, the owner/operator demonstrating compliance under the emissions averaging provisions, must demonstrate compliance on a continuous basis by meeting the requirements in this section.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

e) Reporting Requirements

- (1) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Northwest



District Office, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.

- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous opacity monitor;
 - iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total operating time (hours) of the emissions unit;
 - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii. the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;
 - viii. the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
 - ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

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

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

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of the opacity limit

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



- (2) The permittee shall notify the Northwest District Office in writing of any record which shows a deviation of the allowable SO₂ limitation, as shown by the calculated SO₂ emission rates from section d). The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the deviation occurs.

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

- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63 Subpart DDDDD, including the following sections no later than January 31, 2016:

Applicable Rule	Requirement
40 CFR 63.7495(d); 40 CFR 63.7545; and 40 CFR 63.7530(f)	The notification requirements identified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (6), 40 CFR 63.9(b) through (h), and 40 CFR 63.7545 shall be submitted to the appropriate district office or local air agency no later than the date identified in 40 CFR 63.7545.
40 CFR 63.7550(a) and (b); and 40 CFR Part 63, Subpart DDDDD Table 9	The owner/operator must submit each compliance report identified in Table 9 to the NESHAP that is applicable to the boiler, either semiannually, annually, or biennially according to the requirements identified in 40 CFR 63.7550(b).
40 CFR 63.7550(c) through (h)	These paragraphs identify the information required to be submitted in the compliance reports.
CFR 63.7545(e); CFR 63.7515(g); CFR 63.7530(f); and OAC rule 3745-15-04(A)	A comprehensive written report on the results of performance tests and initial fuel analyses shall be submitted within 60 days after the completion of the test in the Notification of Compliance Status Report. Each report shall verify the unit has not changed or shall provide documentation of the revised parameters established during the performance test. However, Ohio rules require the testing results (signed by the person responsible for the tests) to be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).
40 CFR 63.7521(b)	The site-specific fuel analysis plan must be submitted no later than 60 days before the date of the intended initial compliance demonstration and it shall include the information identified in this paragraph.
40 CFR 63.7522(g)	If demonstrating compliance for existing units through emissions averaging, an implementation plan must be submitted in accordance with this paragraph no later than 180 days before demonstrating compliance using the emission averaging option.
40 CFR 63.7530(e)	The Notification of Compliance Status report must include a signed certification that an energy assessment was completed according to Table 3 to the subpart and that it is an accurate depiction of the facility.
40 CFR 63.7530(h)	If a boiler is subject to emission limits in Tables 1 or 2 to the subpart, must submit a signed statement in the



	Notification of Compliance Status report certifying that good combustion practices were employed during startup and shutdown periods and oxygen concentrations were maintained as specified by the manufacturer.
40 CFR 63.7533(d)	If establishing emissions credits for implementing energy conservation measures, the owner/operator must submit an Implementation Plan (to the appropriate district office or local air agency) for the energy conservation measures to be implemented and it must contain the information contained in this paragraph.
40 CFR 63.7525(k); and 40 CFR 63.7575 (definitions)	If meeting the requirements of a limited-use boiler the operating hours must be recorded and maintained for each unit that is operated under this scenario; and any exceedance of 876 hours of operation per year must be reported.
40 CFR 63.7550(h) and (i)	Within 60 days after the date of completing, results of relative accuracy test audit data and performance test data must be submitted electronically to EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (http://www.epa.gov/cdx). Performance test data must be submitted in the file format generated through EPA's Electronic Reporting Tool (ERT) at: http://www.epa.gov/ttn/chief/ert/index.html .
40 CFR 63.7540(b)	Each instance in which a boiler does not meet each/any applicable emission limit and/or operating limit in Tables 1 through 4 to the subpart, the owner/operator must report each as a deviation from the requirements of the Part 63 Subpart DDDDD, in accordance with 40 CFR 63.7550.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1)(b).

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



b. Emission Limitation

0.225 lb of PE/mmBtu of actual heat input

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

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

c. Emission Limitation

4.50 lbs of SO₂/mmBtu of actual heat input

Applicable Compliance Method

Compliance with the SO₂ limitation shall be demonstrated through the recordkeeping requirements in section d) of this permit and the applicable equation in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with the SO₂ limitation in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

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

d. Emission Limitations

4.0E⁻⁰² lb of filterable PM/MMBtu of heat input; or

5.3E⁻⁰⁵ lb of TSM/MMBtu of heat input; and

2.2E⁻⁰² lb of HCl/MMBtu of heat input; and

5.7E⁻⁰⁶ lb of Hg/MMBtu of heat input; and

130 ppm CO by volume on a dry basis, corrected to 3% O₂, 3-run average; or if using CEMS: 320 ppm CO by volume on a dry basis, corrected to 3% O₂, as a 30-day rolling average.

OR output limits (option)

4.2E⁻⁰² lb of PM/MMBtu of steam output; or

4.9E⁻⁰¹ lb of PM/MWh; or

5.6E⁻⁰⁵ lb of TSM/ MMBtu of steam output; or

6.5E⁻⁰⁴ lb of TSM/MWh; and

2.5E⁻⁰² lb of HCl/MMBtu of steam output; or

0.27 lb HCl/MWh; and

6.4E⁻⁰⁶ lb of Hg/MMBtu of steam output; or

7.3E⁻⁰⁵ lb Hg/MWh; and

0.11 lb CO/MMBtu of steam output, 3-run average; or

1.4 lb CO/MWh, 3-run average

Applicable Compliance Method:



The permittee shall conduct an initial performance test within 180 days after the compliance date to demonstrate compliance with the limitations in the NESHAP. The appropriate tests methods from Table 5 to Subpart DDDDD shall be conducted.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

g) **Miscellaneous Requirements**

- (1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) The opacity monitoring requirements specified in 40 CFR 63.7525(b) and 63.7535 will replace the monitoring requirements of 40 CFR Part 64 and, therefore, the provisions of terms d)(1) through d)(7) will no longer apply after the compliance date in 40 CFR Part 63, Subpart DDDDD.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



2. B007, Nat. Gas Boiler #7

Operations, Property and/or Equipment Description:

73.00 mmBtu/hour Natural Gas-Fired Boiler

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-10(B)(1)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-31-05(A)(3) (PTI #03-7167, modified and issued 04/14/99)	0.10 lb of nitrogen oxides (NO _x)/mmBtu of actual heat input 4.45 lbs of carbon monoxide (CO)/mmBtu of actual heat input 0.04 lb of sulfur dioxide (SO ₂)/mmBtu of actual heat input The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-18-06(A) and 3745-17-10(B).
d.	40 CFR Part 60, Subpart Dc	Exempt (see b)(2)b.)
e.	OAC rule 3745-18-06(A)	See b)(2)a.
f.	40 CFR Part 63, Subpart DDDDD	See Section B.6 – Facility-Wide Terms and Conditions

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).



- b. This regulation does not specify emission limitations for units that fire only natural gas.
- c) Operational Restrictions
 - (1) The permittee shall only burn natural gas in this emissions unit.
[OAC rule 3745-77-07(A)(1)]
- d) Monitoring and/or Recordkeeping Requirements
 - (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
[OAC rule 3745-77-07(C)(1)]
- e) Reporting Requirements
 - (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
[OAC rule 3745-77-07(C)(1)]
- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
0.020 lb of PE/mmBtu of actual heat input

Applicable Compliance Method
The permittee shall demonstrate compliance with the PE limitation by multiplying an emission factor of 1.90 lbs of PE (filterable)/mmft³ of natural gas [AP-42, Table 1.4-2 (revised 7/98)] by the emissions unit's maximum hourly natural gas consumption rate (mmft³/hour), then dividing by the maximum heat input rate (mmBtu/hour).

If required, the permittee shall demonstrate compliance with the PE limitation pursuant to OAC rule 3745-17-03(B)(9).
[OAC rule 3745-77-07(C)(1)]
 - b. Emission Limitation
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule



Applicable Compliance Method

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

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

c. Emission Limitations

0.04 lb of SO₂/mmBtu

0.10 lb of NO_x/mmBtu

4.45 lbs of CO/mmBtu

Applicable Compliance Method

The permittee shall demonstrate compliance with the emission limitations by multiplying the following AP-42 emission factors [Section 1.4 (revised 7/98)] by the maximum natural gas burning capacity (71,569 ft³/hour) and dividing by the maximum hourly heat input capacity (73 mmBtu/hour):

NO_x: 100 lbs/mmft³

SO₂: 0.60 lb/mmft³

CO: 84 lbs/mmft³

If required, the permittee shall demonstrate compliance with the emission limitations in accordance with the following test methods:

NO_x: Methods 1-4 and 7 of 40 CFR Part 60, Appendix A

SO₂: Methods 1-4 and 6 of 40 CFR Part 60, Appendix A

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

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

g) Miscellaneous Requirements

(1) None.



3. F002, Miscellaneous Welding/Grinding

Operations, Property and/or Equipment Description:

Miscellaneous Welding and Grinding - Building 147

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0103887, issued 05/19/09)	4.85 tons of fugitive particulate emissions (PE)/year See b)(2)c.
b.	OAC rule 3745-17-07(B)	See b)(2)a.
c.	OAC rule 3745-17-08(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located outside the City of Lima in Allen County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

c. All PE is assumed to be PM10.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

4.85 tons of fugitive PE/year

Applicable Compliance Method:

The annual PE limitation represents the potential to emit for this emissions unit, attenuated by a 70% control efficiency provided by the building. The potential to emit was calculated as follows:

$$E = (\text{maximum weld wire throughput rate, in tons/year}) \times EF \times (1 - CE)$$

Where

E = PE rate (tons/year)

Maximum weld wire throughput rate = 421 tons/year

EF = PM10 emission factor of 76.80 lbs/ton for welding operations [AP-42 Table 12.10-1]

CE = control efficiency of the building (assumed to be 70%)

[OAC rule 3745-77-07(C)(1) and PTI #P0103887]

g) Miscellaneous Requirements

(1) None.



4. K006, EFV & Cougar Paint Line

Operations, Property and/or Equipment Description:

Wash, Clean, Prime, Top-Ext, Top-Int Booths and AMUs (PA-32, 33, 34, 35, 36)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(5), d)(6), and d)(7)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-17347, issued 10/30/07)	172.02 lbs of organic compounds (OC)/hour for wash solvent, coating and cleanup operations 58.18 tons of OC/year for wash solvent, coating and cleanup operations See b)(2)d.
b.	OAC rule 3745-31-05(D) (PTI #03-17347, issued 10/30/07)	40.52 tons of volatile organic compounds (VOC)/rolling, 12-month period for wash solvent, coating and cleanup operations (see b)(2)b.) 0.40 ton of particulate matter 10 microns or less in size (PM10)/rolling, 12-month period (see b)(2)b.)
c.	ORC 3704.03(T)(4)	See b)(2)a.
d.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (see b)(2)c.)
e.	OAC rule 3745-17-11(C)	See b)(2)f. and c)(3).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate emissions (PE) from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pound of PE



per hour from each coating booth operation under OAC rule 3745-17-11(B) [OAC rule 3745-17-11(B) is no longer applicable but BAT still does not apply taking into account the federally enforceable limitation established pursuant OAC rule 3745-31-05(D)]. All emissions of particulate matter are PM10 and, therefore, BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PM10 or PE.

- b. PTI #03-17347 established the following federally enforceable emission limitations based on material usage restrictions for emissions unit K006 (see c)(1) and c)(2)):
 - i. 40.52 tons of VOC per rolling 12-month period
 - ii. 0.40 ton of PM10 per rolling 12-month period
- c. The VOC content restriction, excluding water and exempt solvents, as contained in 3745-21-09(U)(1)(c), applies to all coatings employed in emissions unit K006.
- d. The OC emission limitations involve organic compounds which do not participate in atmospheric photochemical reactions and, therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR, 51.100(s).
- e. The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- f. Any surface coating process with a permit-to-install issued after January 1, 1990 that identifies PE limitations and control measures based on BAT, shall comply with such limitations and measures instead of paragraphs (C)(1) and (C)(2) of OAC rule 3745-17-11(C).

c) Operational Restrictions

- (1) The maximum rolling 12-month quantity of materials containing VOC (wash solvent, coatings, cleanup materials, etc.) employed in emissions unit K006 shall be limited by the following equation:

$$\sum_{M=1}^{12} \left\{ \sum_{i=1}^n [(V_i)(G_i)] \frac{1 \text{ ton}}{2000 \text{ lbs}} \right\} \leq 40.52 \text{ tons}$$

Where:

M = the increment of the rolling 12-month period;

Vi = VOC content in pounds per gallon of each material containing VOC (wash solvent, coatings, cleanup materials, etc.) employed;

Gi = gallons of each material containing VOC (wash solvent, coatings, cleanup materials, etc.) used during the rolling 12-month period; and



n = total number of materials containing VOC (wash solvent, coatings, cleanup materials, etc.) employed in emissions unit K006. [OAC rule 3745-77-01(A)(1) and PTI #03-17347]

- (2) The maximum rolling 12-month quantity of coatings applied resulting in PM10 emissions shall be limited by the following equation:

$$\sum_{M=1}^{12} \left\{ \sum_{i=1}^n \left[(V_i)(D_i)(S_i) \left(1 - \frac{T_i}{100} \right) \left(1 - \frac{C}{100} \right) \right] \left(\frac{ton}{2000 lbs} \right) \right\} \leq 0.40 ton$$

Where:

M = the increment of the rolling, 12-month period;

V_i = the volume, in gallons of each coating employed;

D_i = density in pounds per gallon of each coating (top coat, primer, etc.) employed;

S_i = solids content (percent by weight) of each coating (top coat, primer, etc.);

T_i = the percent transfer efficiency associated with each coating;

C = a control efficiency of 99% for use of dry filtration (capture efficiency = 100%); and

n = total number of coatings applied resulting in PM10 emissions (top coat, primer, etc.) employed in emissions unit K006. [OAC rule 3745-77-01(A)(1) and PTI #03-17347]

- (3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17347]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-01(C)(1) and PTI#03-17347]

- (2) The permittee shall maintain monthly records of the following OC/VOC information for emissions unit K006:

- a. the name and identification number of each wash solvent, coating and cleanup material employed;
- b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for C_{voc,2}];



- c. the VOC content of each wash solvent, coating and cleanup material employed, in lbs/gal, as applied;
- d. the OC content of each wash solvent, coating and cleanup material employed, in lbs/gal, as applied;
- e. the volume, in gallons, of each wash solvent, coating and cleanup material employed;
- f. the total VOC emissions, in tons, from all wash solvents, coatings and cleanup materials employed, prior to any credit claimed for solvent recycling [i.e., the summation of (c. x e.) for all coatings and cleanup materials, divided by 2000 lbs/ton];
- g. the rolling 12-month VOC emissions, in tons, from all the wash solvents, coatings and cleanup materials employed, prior to any credit claimed for solvent recycling;
- h. the total OC emissions, in tons, from all wash solvents, coatings and cleanup materials employed, prior to any credit claimed for solvent recycling [i.e., the summation of (d. x e.) for all coatings and cleanup materials, divided by 2000 lbs/ton]; and
- i. the annual, year-to-date, OC emissions from all wash solvents, coatings and cleanup operations, in tons per year (summation of h. for each calendar month to date from January to December).

[OAC rule 3745-77-01(C)(1) and PTI #03-17347]

- (3) If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling 12-month emission calculations, the permittee shall maintain the following records for the recovered materials and the recovery drum or tank serving this emissions unit:
- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
 - b. the total amount of material collected and shipped for recycling/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
 - c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
 - d. the mass (lbs) of VOC to be credited to the rolling 12-month emissions summation from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b. x c.), and the date of each such shipment or record of credit;
 - e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit for the materials shipped for recycling/recovery and/or disposal at an



outside facility, summed from the records of the VOC emission credits in(3)d., for each shipment recorded during the rolling 12-month period; and

- f. the rolling 12-month VOC emissions from the materials employed, after any credit claimed for solvent recycling.

[OAC rule 3745-77-01(C)(1) and PTI #03-17347]

- (4) The permittee shall maintain monthly records of the following PM10 information for emissions unit K006:

- a. the name and identification number of each coating employed;
- b. the density of each coating employed, in pounds per gallon (Di), as applied;
- c. the solids content of each coating employed, in percent by weight (Si), as applied;
- d. the volume, in gallons (Vi), of each coating employed;
- e. the percent transfer efficiency (Ti) associated with each coating employed;
- f. the calculated PM10 emissions from each coating employed using the following equation:

$$\text{PM10 emissions in lbs} = (Vi)(Di)(Si)(1 - Ti/100)(1 - C/100)$$

C = a control efficiency of 99% for use of dry filtration

- g. the total PM10 emissions, in tons, from all coatings employed [i.e., the summation of d)(4)f. for all coatings, divided by 2000 lbs/ton];
- h. the rolling 12-month PM10 emissions, in tons, from all the coatings employed.

[OAC rule 3745-77-01(C)(1) and PTI #03-17347]

- (5) The PTI for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the PTI application, and modeling was performed for the toxic pollutant emitted at over 1 ton per year using the SCREEN 3.0 model or other Ohio EPA-approved model.

The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model (or other approved model) was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide # 70. The following summarizes the results of the modeling for the "worst-case" pollutant:



Pollutant: MIBK

TLV (mg/m3): 204,826.00

Maximum Hourly Emission Rate (lbs/hr): 36.95

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 514.30

MAGLC (ug/m3): 4,876.80

[PTI #03-17347]

(6) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the TLV previously modeled, as documented in the most recent version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[PTI #03-17347]

(7) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing PTI will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final PTI prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);



- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[PTI #03-17347]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI#03-17347]

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

- a. all exceedances of the rolling, 12-month VOC emission limitation of 40.52 tons; and
- b. all exceedances of the rolling, 12-month PM10 emission limitation of 0.40 ton.

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

[OAC rule 3745-77-01(C)(1) and PTI #03-17347]

- (3) The permittee shall submit annual reports that summarize the total annual actual OC emissions from wash solvents, coatings and cleanup operations. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-01(C)(1) and PTI #03-17347]

- (4) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17347]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation

40.52 tons of VOC per rolling, 12-month period for wash solvent, coating, and cleanup operations.

Applicable Compliance Method

Compliance with the rolling VOC emission limitation shall be based upon the recordkeeping requirements in sections d)(2) and d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17347]

b. Emission Limitation

3.5 pounds of VOC/gallon of coating, excluding water and exempt solvents, for an extreme performance coating

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17347]

c. Emission Limitation

172.02 lbs of OC/hour, from wash solvent, coating, and cleanup operations

Applicable Compliance Method

The hourly OC emission limitation represents the potential to emit for this emissions unit and was based on the following worst-case operating scenario for the paint line:

Wash Solvent: 0.86 lb of OC/gallon x 10.67 gallons/hour = 9.18 lbs of OC/hour
Primer Coating: 2.84 lbs of OC/gallon x 6.67 gallons/hour = 18.94 lbs of OC/hour
Top Coat (Ext.): 5.18 lbs of OC/gallon x 4.00 gallons/hour = 20.72 lbs of OC/hour
Top Coat (Int): 5.17 lbs of OC/gallon x 1.77 gallons/hour = 9.15 lbs of OC/hour
Non-Skid: 2.95 lbs of OC/gallon x 3.67 gallons/hour = 10.83 lbs of OC/hour
Cleanup: 6.88 lbs of OC/gallon x 15.00 gallons/hour = 103.20 lbs of OC/hour
9.18 + 18.94 + 20.72 + 9.15 + 10.83 + 103.20 = 172.02 lbs of OC/hour

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60, Appendix A, Methods 1–4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17347]

d. Emission Limitation

58.18 tons of OC/year, from wash solvent, coating, and cleanup operations



Applicable Compliance Method

Compliance with the annual OC emission limitation shall be based upon the recordkeeping requirements specified in sections d)(2) and d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17347]

e. Emission Limitation

0.40 ton of PM10 per rolling, 12-month period

Applicable Compliance Method

Compliance with the rolling PM10 emissions limitation shall be based upon the recordkeeping requirements specified in section d)(4) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17347]

- (2) Formulation data or U.S. EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine OC/VOC content of materials.

[OAC rule 3745-77-07(C)(1) and PTI #03-17347]

g) Miscellaneous Requirements

- (1) None



5. P002, Shotblast SB-5

Operations, Property and/or Equipment Description:

Shotblast Unit (Tank Hull & Turret and Cougar Abrasive Blast) with Cartridge Filter System

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (PTI No. P0106936 modified and issued 11/10/10)	0.21 lb particulate matter equal to or less than 10 microns in size (PM ₁₀)/hour and 0.51 ton PM ₁₀ /year Visible particulate emissions (PE) shall not exceed 0% opacity as a six-minute average. See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (PTI No. P0106936, modified and issued 11/10/10)	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006 (PTI No. P0106936, modified and issued 11/10/10)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.

(2) Additional Terms and Conditions

a. PTI No. P0106936 established the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Best Available Technology (BAT) requirements. The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which require control equipment:



- i. PM₁₀ emissions shall not exceed 0.21 lb/hour and 0.51 ton/year; and
- ii. Visible PE shall not exceed 0% opacity as a six-minute average.

All emissions of particulate matter from the cartridge filter stack are PM₁₀.

- b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in PTI No. P0106936.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective December 1, 2006 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM₁₀ emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration air pollution controls installed on the source, as required in the federally enforceable requirements established under OAC rule 3745-31-05(D).

- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- e. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE (see b)(2)a.):
 - a. This emissions unit shall be vented to a cartridge filter system capable of achieving a maximum outlet concentration of 0.001 grain per dscf for PM₁₀.

[OAC rule 3745-77-07(A)(1) and PTI No. P0106936]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks when the emissions unit is in operation, and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in PTI #P0106936 issued on 11/10/10: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

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

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

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirement is as stringent as or more stringent than the reporting requirements contained in PTI #P0106936 issued on 11/10/10: e)(1). The reporting requirements contained in the above-referenced PTI are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the PTI.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation

0.001 grain of PM10/dscf

Applicable Compliance Method

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the cartridge filter. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Northwest District Office.

[OAC rule 3745-77-07(C)(1) and PTI P0106936]

b. Emission Limitation

0.21 lb of PM10/hour

Applicable Compliance Method

The hourly emission limitation was determined by multiplying the maximum outlet concentration of 0.001 grain of PM10/dscf by a volumetric air flow of 25,000 acfm and conversion factors of 7000 grains/lb, 1 dscf/1 acfm, and 60 minutes/hour.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Northwest District Office.

[OAC rule 3745-77-07(C)(1) and PTI P0106936]

c. Emission Limitation

0.51 ton of PM10/year

Applicable Compliance Method

The annual emission limitation was determined by multiplying the maximum outlet concentration of 0.001 grain of PM10/dscf by a maximum volumetric air flow of 25,000 acfm, and conversion factors of 7000 grains/lb, 1 dscf/1 acfm, and 60 minutes/hour, and a maximum operating schedule of 4735 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the 0.001 grain/dscf limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and P0106936]



d. Emission Limitation

Visible PE shall not exceed 0% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and P0106936]

g) Miscellaneous Requirements

(1) None.



6. P008, Shotblast SB-6

Operations, Property and/or Equipment Description:

Shotblast Unit (Tank Hull & Turret and Cougar Abrasive Blast) with Cartridge Filter

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) (PTI No. 03-17360, modified and issued 1/29/08)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.001 grain per dry standard cubic foot (dscf) and 2.26 tons per year. Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
d.	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See sections d) and e)

(2) Additional Terms and Conditions

a. Permit to Install No. 03-17360 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



- i. use of a cartridge filter achieving a maximum outlet concentration of 0.001 grain/dscf of PM10* and an associated 0% opacity, as a six-minute average

The potential to emit (PTE) for this emissions unit is 2.26 tons of PM10/year. The annual PTE was determined by multiplying the maximum outlet concentration of 0.001 grain PM10/dscf by a maximum volumetric air flow of 60,000 acfm, applying the appropriate conversion factors of 7,000 grains/lb, 1 dscf/1acfm, and 60 minutes/hour; then multiplying by the maximum operating schedule of 8,760 hrs/year and dividing by 2,000 lbs/ton.

*All particulate matter emissions are PM10.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the cartridge filter controlling this emissions unit is daily visible emission checks. When the daily visible emission checks show operation outside of its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in section e)(1). The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The cartridge filter shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the Northwest District Office and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

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



- a. the color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) The permittee has developed an inspection and maintenance program for the cartridge filter as indicated below. At a minimum, the following shall be conducted:

- a. At least once every month, the permittee shall:
 - i. Check the filters for deterioration or degradation;
 - ii. Check the cleaning system for proper operation; and
 - iii. Check the hoppers and conveyance systems for proper operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirement is as stringent as or more stringent than the monitoring and recordkeeping requirements contained in PTI #03-17360 issued on 01/29/08: d)(3). The monitoring and recordkeeping requirements contained in the above-referenced PTI are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the PTI.

e) Reporting Requirements

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

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

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirement is as stringent as or more stringent than the reporting requirements contained in PTI #03-17360 issued on 01/29/08: e)(1). The reporting requirements contained in the above-referenced PTI are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the PTI.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation

0.001 grain of PM10/dscf

Applicable Compliance Method

The emission limitation was established in accordance with the manufacturer's guaranteed outlet grain loading for the cartridge filter. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Northwest District Office.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17360]

b. Emission Limitation

2.26 tons of PM10/year

Applicable Compliance Method

The annual emission limitation was determined by multiplying the maximum outlet concentration of 0.001 grain of PM10/dscf by a maximum volumetric air flow of 60,000 acfm, conversion factors of 7000 grains/lb, 1 dscf/1 acfm, and 60 minutes/hour, and a maximum operating schedule of 8760 hours/year, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the 0.001 grain/dscf limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17360]

c. Emission Limitation

Visible PE shall not exceed 0% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17360]

g) Miscellaneous Requirements

- (1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



7. P011, Shotblast SB-7

Operations, Property and/or Equipment Description:

Small Parts Shotblast Unit with Baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(1)	3.38 lbs of particulate emissions (PE)/hour
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-31-05(A)(3) (PTI No. 03-1196, issued 02/03/83)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B).
d.	40 CFR, Part 64 - Compliance Assurance Monitoring	See sections d) and e)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is daily visible emission checks. When the daily visible emission checks show operation outside of its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in section e)(1). The emissions unit and control equipment shall



be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability. [OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the Northwest District Office and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (3) The permittee shall perform daily checks when the emissions unit is in operation, and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) The permittee has developed an inspection and maintenance program for the baghouse as indicated below. At a minimum, the following shall be conducted:
 - a. At least once every month, the permittee shall:
 - i. Check the bags/filters for deterioration or degradation;
 - ii. Check the cleaning system for proper operation; and
 - iii. Check the hoppers and conveyance systems for proper operation.



[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirement is as stringent as or more stringent than the monitoring and recordkeeping requirements contained in PTI #03-1196 issued on 02/03/83: d)(1). The monitoring and recordkeeping requirements contained in the above-referenced PTI are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the PTI.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1). [OAC rule 3745-77-07(C)(1)]

b. Emission Limitation

3.38 lbs of PE/hour

Applicable Compliance Method

The permittee may demonstrate compliance the hourly PE limitation by multiplying a maximum outlet concentration of 0.03 grain of PE/dscf* by the total maximum volumetric air flow rate of 4000 acfm and conversion factors of 1 lb/7000 grains and 60 minutes/hour.

* Based on information from the manufacturer



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

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If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(10).

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

g) Miscellaneous Requirements

- (1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



8. P014, Shotblast SB-8

Operations, Property and/or Equipment Description:

Shotblast Unit with Baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(1)	3.02 lbs of particulate emissions (PE)/hour
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-31-05(A)(3) (PTI No. 03-1542, issued 01/25/84)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B).
d.	40 CFR, Part 64 - Compliance Assurance Monitoring	See sections d) and e)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is daily visible emission checks. When the daily visible emission checks show operation outside of its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in section e)(1). The emissions unit and control equipment shall



be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the Northwest District Office and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (3) The permittee shall perform daily checks when the emissions unit is in operation, and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) The permittee has developed an inspection and maintenance program for the baghouse as indicated below. At a minimum, the following shall be conducted:
 - a. At least once every month, the permittee shall:
 - i. Check the bags/filters for deterioration or degradation;
 - ii. Check the cleaning system for proper operation; and



- iii. Check the hoppers and conveyance systems for proper operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1).

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

- b. Emission Limitation

3.02 lbs of PE/hour

Applicable Compliance Method

The permittee may demonstrate compliance the hourly PE limitation by multiplying a maximum outlet concentration of 0.03 grain of PE/dscf* by the total maximum volumetric air flow rate of 3410 acfm and conversion factors of 1 lb/7000 grains and 60 minutes/hour.

* Based on information from the manufacturer

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(10).



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

g) Miscellaneous Requirements

- (1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



9. P017, Pneumatic Ash Convey System

Operations, Property and/or Equipment Description:

Pneumatic Ash Conveying and Collection System, Powerhouse Ash System with Baghouse and Wet Suppression System

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI No. 03-14056, issued 12/11/03)	0.03 grain particulate emissions (PE)/dry standard cubic foot; 0.39 lb PE/hour; 1.71 tons PE/year from baghouse stack (see b)(2)a.) No visible fugitive PE from egress points serving this emissions unit See b)(2)b. and b)(2)c.
b.	OAC rule 3745-17-07(A)	Visible PE from the baghouse stack shall not exceed 20% opacity as a six-minute average, except as provided by rule
c.	OAC rule 3745-17-11(B)	See b)(2)d.
d.	OAC rule 3745-17-07(B)	See b)(2)e.
e.	OAC rule 3745-17-08(B)	See b)(2)f.

(2) Additional Terms and Conditions

a. All PE is inclusive of and assumed to be particulate matter less than 10 microns in size (PM10).

b. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the following:

i. the use of a baghouse for controlling ash conveying and collection; and

ii. the use of wet suppression for truck loading of ash.



- c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- f. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

- (2) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:



- a. the color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

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

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. For visible emissions from stack:

- i. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- ii. describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

b. For visible emissions of fugitive dust:

- i. all days during which any visible emissions of fugitive dust were observed from the area immediately above the capture system serving this emissions unit; and
- ii. any corrective actions taken to eliminate the visible emissions.

These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous six-month period.

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

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

0.03 grain of PE/dscf; 0.39 lb of PE/hour; 1.71 tons of PE/year

Applicable Compliance Method

The 0.03 grain of PE/dscf is the established maximum outlet concentration for the baghouse. The permittee shall demonstrate compliance with the hourly PE limitation by multiplying the maximum outlet concentration of 0.03 grain of PE/dscf by the total maximum volumetric air flow rate of 1500 acfm and conversion factors of 1 lb/7000 grains and 60 minutes/hour. If required, compliance with the grain of PE/dscf and hourly limitations shall be demonstrated in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.



The annual limitation was established by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation. [OAC rule 3745-77-07(C)(1) and PTI #03-14056]

b. Emission Limitation

No visible fugitive PE from egress points serving this emissions unit

Applicable Compliance Method

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A, Method 22.

[OAC rule 3745-77-07(C)(1) and PTI #03-14056]

c. Emission Limitation

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-14056]

g) Miscellaneous Requirements

(1) None.



10. P019, Shotblast SB-9

Operations, Property and/or Equipment Description:

Shot Blast Machine with Baghouse (SB-9)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI No. 03-05074, modified and issued 05/08/08)	2.31 lbs of particulate emissions (PE)/hour The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)a.
d.	40 CFR, Part 64 - Compliance Assurance Monitoring	See sections d) and e)

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is daily visible emission checks. When the daily visible emission checks show operation outside of its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution



control practices for minimizing emissions, and shall comply with the reporting requirements specified in section e)(1). The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the Northwest District Office and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (3) The permittee shall perform daily checks when the emissions unit is in operation, and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) The permittee has developed an inspection and maintenance program for the baghouse as indicated below. At a minimum, the following shall be conducted:
 - a. At least once every month, the permittee shall:
 - i. Check the bags/filters for deterioration or degradation;



- ii. Check the cleaning system for proper operation; and
- iii. Check the hoppers and conveyance systems for proper operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

2.31 lbs of PE/hour

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly PE limitation by multiplying the maximum outlet concentration of 0.03 grain of PE/dscf* by the total maximum volumetric air flow rate of 9000 acfm and conversion factors of 1 lb/7000 grains and 60 minutes/hour. If required, the permittee shall demonstrate compliance with the hourly PE limitation in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI #03-05074]

* Based on information supplied by the manufacturer

- b. Emission Limitation

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1).



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

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

g) Miscellaneous Requirements

- (1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



11. P020, Shotblast SB-10

Operations, Property and/or Equipment Description:

Shot Blast Machine with Baghouse (SB-10)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI No. 03-05074, modified and issued 05/08/08)	0.83 lb of particulate emissions (PE)/hour The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)a.
d.	40 CFR, Part 64 - Compliance Assurance Monitoring	See sections d) and e)

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is daily visible emission checks. When the daily visible emission checks show operation outside of its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution



control practices for minimizing emissions, and shall comply with the reporting requirements specified in section e)(1). The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the Northwest District Office and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (3) The permittee shall perform daily checks when the emissions unit is in operation, and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) The permittee has developed an inspection and maintenance program for the baghouse as indicated below. At a minimum, the following shall be conducted:
 - a. At least once every month, the permittee shall:
 - i. Check the bags/filters for deterioration or degradation;



- ii. Check the cleaning system for proper operation; and
- iii. Check the hoppers and conveyance systems for proper operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

0.83 lb of PE/hour

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly PE limitation by multiplying the maximum outlet concentration of 0.03 grain of PE/dscf* by the total maximum volumetric air flow rate of 3225 acfm and conversion factors of 1 lb/7000 grains and 60 minutes/hour. If required, the permittee shall demonstrate compliance with the hourly PE limitation in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI #03-05074]

* Based on information supplied by the manufacturer

- b. Emission Limitation

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1).



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

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

g) Miscellaneous Requirements

- (1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8. [OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



12. P023, Shotblast Media Airwash SB-5

Operations, Property and/or Equipment Description:

Shotblast Media Airwash Separator with Cartridge Filter

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-9669, modified and issued 05/30/96)	0.77 lb of particulate emissions (PE)/hour The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)a.
d.	40 CFR, Part 64 - Compliance Assurance Monitoring	See sections d) and e)

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is daily visible emission checks. When the daily visible emission checks show operation outside of its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution



control practices for minimizing emissions, and shall comply with the reporting requirements specified in section e)(1). The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the Northwest District Office and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (3) The permittee shall perform daily checks when the emissions unit is in operation, and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) The permittee has developed an inspection and maintenance program for the cartridge filter as indicated below. At a minimum, the following shall be conducted:
- a. At least once every month, the permittee shall:
 - i. Check the filters for deterioration or degradation;



- ii. Check the cleaning system for proper operation; and
- iii. Check the hoppers and conveyance systems for proper operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

0.77 lb of PE/hour

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly PE limitation by multiplying the maximum outlet concentration of 0.03 grain of PE/dscf* by the total maximum volumetric air flow rate of 6,000 acfm and conversion factors of 1 lb/7000 grains and 60 minutes/hour. If required, the permittee shall demonstrate compliance with the hourly PE limitation in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI #03-9669]

* Based on information supplied by the manufacturer

b. Emission Limitation

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1).



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

[OAC rule 3745-77-07(C)(1) and PTI #03-9669]

g) Miscellaneous Requirements

- (1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64].



13. P024, Engine Hot Testing

Operations, Property and/or Equipment Description:

Tank turbine engines fired by JP-8 jet kerosene, runs the engine with no load other than the transmission, to perform a specified engine test sequence

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-9871, issued 11/27/96)	1.62 lbs of carbon monoxide (CO)/hour 0.22 lb of organic compounds (OC)/hour 1.62 lbs of nitrogen oxides (NOx)/hour 0.54 lb of sulfur dioxide (SO2)/hour See c)(1)
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(B)	See b)(2)b.
d.	OAC rule 3745-18-06(G)	See b)(2)c.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Table I of OAC rule 3745-17-11 does not apply because the process weight rate, as defined in OAC rule 3745-17-01(B)(17), is equal to zero.*

* The only material introduced into this process is a liquid fuels that is used solely as fuel for the purpose of combustion.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).



- c. This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(C) because the process weight rate, as defined in OAC rule 3745-18-01(B)(14), is equal to zero.*

* The only material introduced into this process is a liquid fuels that is used solely as fuel for the purpose of combustion.

c) Operational Restrictions

- (1) Fuel usage in this emissions unit shall not exceed eight gallons per hour.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the following information:

- a. the number of gallons of fuel used;
- b. the number of hours the emissions unit was in operation; and
- c. the average hourly fuel usage rate [d)(1)a./d)(1)b.], in gallons/hour (average).

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly fuel usage exceeded 8 gallons per hour, and the actual average hourly fuel usage rate for each such day. The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

1.62 lbs of CO/hour

Applicable Compliance Method

The permittee shall demonstrate compliance by multiplying the average hourly usage rate by the density of fuel used (6.76 lbs/gallon) and an emission factor of 30 lbs of CO/1,000 lbs of fuel used.*



* This emission factor was supplied by the permittee.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

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

b. Emission Limitation

0.22 lb of OC/hour

Applicable Compliance Method

The permittee shall demonstrate compliance by multiplying the average hourly usage rate by the density of fuel used (6.76 lbs/gallon) and an emission factor of 4 lbs of OC/1,000 lbs of fuel used.*

* This emission factor was supplied by the permittee.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A.

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

c. Emission Limitation

1.62 lbs of NO_x/hour

Applicable Compliance Method

The permittee shall demonstrate compliance by multiplying the average hourly usage rate by the density of fuel used (6.76 lbs/gallon) and an emission factor of 30 lbs of NO_x/1,000 lbs of fuel used.*

* This emission factor was supplied by the permittee.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

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

d. Emission Limitation

0.54 lb of SO₂/hour

Applicable Compliance Method

The permittee shall demonstrate compliance by multiplying the average hourly usage rate by the density of fuel used (6.76 lbs/gallon) and an emission factor of 0.005 lb of SO₂/1,000 lbs of fuel used.*



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

* This emission factor was supplied by the permittee.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

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

g) Miscellaneous Requirements

(1) None.



14. Emissions Unit Group -Air Arcing Units, Group #1: P036, P037

EU ID	Operations, Property and/or Equipment Description
P036	Air Arcing Unit AC-3A
P037	Air Arcing Unit AC-3B

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI No. P0104852, issued 9/24/09)	Filterable particulate matter equal to or less than 10 microns in size (PM ₁₀) shall not exceed 0.002 grain per dry standard cubic foot (dscf) and 0.60 ton per year for emissions units P036, P037 and P040 combined. Visible stack particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average [see b)(2)a.ii.] No visible fugitive particulate emissions from the building containing this emissions unit [see b)(2)a.iii. and iv.] See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)b.

(2) Additional Terms and Conditions

a. PTI No. P0104852 takes into account the following voluntary restrictions as proposed by the permittee for the purpose of establishing practically and legally enforceable limitations representing the potential to emit for PM₁₀ from emissions units P036, P037, and P040 combined:



- i. Use of a control system consisting of multiple air filtration units as described below:
 - (a) A 20,000 acfm cartridge filter (FC-3A) shall be dedicated to solely control emissions unit P036, and a 20,000 acfm cartridge filter (FC-3B) shall be dedicated to solely control emissions unit P037. The exhaust from cartridge filters FC-3A and FC-3B shall exhaust into "Block 3" of Building 351. "Block 3" of Building 351 contains emissions unit P036 as well as emission units P037 and P040.
 - (b) A portion of the air within "Block 3" of Building 351 shall be recirculated through an approximately 15,000 acfm HEPA filter. The exhaust from the HEPA filter exhausts into "Block 3" of Building 351.
 - (c) Air will exit "Block 3" of Building 351 by being vented to an 8000 acfm HEPA filter (HEPA-351-3) achieving a maximum outlet concentration of 0.002 grain filterable PM₁₀/dscf.
- ii. A visible emission restriction (associated with the air filtration control system) not to exceed 0% opacity as a six-minute average from the HEPA filter (HEPA-351-3) stack controlling air exiting "Block 3" of Building 351;
- iii. The stack for HEPA filter (HEPA-351-3) shall be the only point of egress for emissions from "Block 3" of Building 351 (i.e., all doors, windows, roof vents, etc. shall remain closed during all times of operation).
- iv. A visible emission restriction (associated with the egress requirement in iii. above) of no visible fugitive particulate emissions from "Block 3" of Building 351.

The potential to emit (PTE) for emissions units P036, P037, and P040 combined is 0.60 ton of filterable PM₁₀/year. The annual PTE was determined by multiplying the maximum outlet concentration of 0.002 grain filterable PM₁₀/dscf by a maximum volumetric air flow of 8000 acfm, applying the appropriate conversion factors of 7000 grains/lb, 1 dscf/1acfm, and 60 minutes/hour, then multiplying the maximum operating schedule of 8760 hours/year, and dividing by 2000 lbs/ton. It should be noted that all emissions of particulate matter are PM₁₀.

- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the voluntary restrictions established in this permit.
- c) Operational Restrictions
 - (1) The emissions from each emissions unit shall be controlled in accordance with the air filtration requirements specified in this permit at all times each emissions unit is in operation.



[OAC rule 3745-77-07(A)(1) and PTI #P0104852]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain, equipment to continuously monitor the pressure drop, in inches of water, across the HEPA filter (HEPA-351-3) during operation of each emissions unit. 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 HEPA filter (HEPA-351-3) on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the HEPA filter (HEPA-351-3) is 0.5 - 3 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the range based upon information obtained during future particulate emissions tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[OAC rule 3745-77-07(C)(1) and PTI No. P0104852]

- (2) The permittee shall perform daily checks when emissions units P036, P037 and/or P040 are in operation for any visible fugitive particulate emissions from "Block 3" of Building 351. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:



- a. the location and color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

The permittee shall also perform daily checks of "Block 3" of Building 351 to ensure all doors, windows, roof vents, etc. are closed as required by b)(2)a.iii.

[OAC rule 3745-77-07(C)(1) and PTI No. P0104852]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of each emissions unit:

- a. each period of time (start time and date, and end time and date) when the pressure drop across the HEPA filter (HEPA-351-3) was outside of the acceptable range specified by this permit;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not controlled in accordance with the air filtration system specified by this permit;
- c. each incident of deviation described in (a) where a prompt investigation was not conducted;
- d. each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0104852]

- (2) The permittee shall submit semiannual written reports that identify all days during which any visible fugitive particulate emissions were observed from "Block 3" of Building 351 and describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous six-month period.

[OAC rule 3745-77-07(C)(1) and PTI No. P0104852]



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

0.002 grain of filterable PM10/dscf

Applicable Compliance Method

The filterable gr/dscf limitation was established in accordance with a rated outlet concentration for the HEPA filter of the manufacturer's guaranteed grain loading.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)(1) and PTI No. P0104852]

b. Emission Limitation

0.60 ton of filterable PM10/year

Applicable Compliance Method

The annual limitation was established by multiplying the maximum outlet concentration of 0.002 grain of filterable PM10/dscf by the maximum volumetric air flow rate of 8000 acfm and conversion factors of 1 lb/7000 grains, 60 minutes/hour, 8760 hours/year, and 1 ton/2000 lbs. Therefore, provided compliance is demonstrated with the 0.002 grain of filterable PM10/dscf limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI No. P0104852]

c. Emission Limitation

Visible stack PE shall not exceed 0% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, the compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1) and PTI No. P0104852]



d. Emission Limitation

No visible fugitive PE from the building containing this emissions unit

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

[OAC rule 3745-77-07(C)(1) and PTI No. P0104852]

g) Miscellaneous Requirements

(1) None.



15. Emissions Unit Group -Air Arcing Units, Group #2: P038, P039

EU ID	Operations, Property and/or Equipment Description
P038	Air Arcing Unit AC-4A
P039	Air Arcing Unit AC-4B

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI No. P0104852, issued 9/24/09)	Filterable particulate matter equal to or less than 10 microns in size (PM ₁₀) shall not exceed 0.002 grain per dry standard cubic foot (dscf) and 0.60 ton per year for emissions units P038 and P039 combined. Visible stack particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average [see b)(2)a.ii.] No visible fugitive particulate emissions from the building containing this emissions unit [see b)(2)a.iii. and iv.] See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)b.

(2) Additional Terms and Conditions

a. PTI No. P0104852 takes into account the following voluntary restrictions as proposed by the permittee for the purpose of establishing practically and legally enforceable limitations representing the potential to emit for PM₁₀ from emissions units P038 and P039 combined:



- i. Use of a control system consisting of multiple air filtration units as described below:
 - (a) A 20,000 acfm cartridge filter (FC-4A) shall be dedicated to solely control emissions unit P038 and a 20,000 acfm cartridge filter (FC-4B) shall be dedicated to solely control emissions unit P039. The exhaust from cartridge filters FC-4A and FC-4B shall exhaust into "Block 4" of Building 351. "Block 4" of Building 351 contains emissions unit P038 as well as emission unit P039.
 - (b) A portion of the air within "Block 4" of Building 351 shall be recirculated through an approximately 15,000 acfm HEPA filter. The exhaust from the HEPA filter exhausts into "Block 4" of Building 351.
 - (c) Air will exit "Block 4" of Building 351 by being vented to an 8,000 acfm HEPA filter (HEPA-351-4) achieving a maximum outlet concentration of 0.002 grain filterable PM₁₀/dscf.
- ii. A visible emission restriction (associated with the air filtration control system) not to exceed 0% opacity, as a 6-minute average from the HEPA filter (HEPA-351-4) stack controlling air exiting "Block 4" of Building 351;
- iii. The stack for HEPA filter (HEPA-351-4) shall be the only point of egress for emissions from "Block 4" of Building 351 (i.e. all doors, windows, roof vents, etc. shall remain closed during all times of operation).
- iv. A visible emission restriction (associated with the egress requirement in iii. above) of no visible fugitive particulate emissions from "Block 4" of Building 351.

The potential to emit (PTE) for emissions units P038 and P039 combined is 0.60 ton filterable PM₁₀/year. The annual PTE was determined by multiplying the maximum outlet concentration of 0.002 grain filterable PM₁₀/dscf by a maximum volumetric air flow of 8000 acfm, applying the appropriate conversion factors of 1 lb/7000 grains, 1 dscf/1acfm, and 60 minutes/hour and multiplying the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. It should be noted that all emissions of particulate matter are PM₁₀.

- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to voluntary restrictions established in this permit.

c) **Operational Restrictions**

- (1) The emissions from each emissions unit shall be controlled in accordance with the air filtration requirements specified in this permit at all times each emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI #P0104852]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain, equipment to continuously monitor the pressure drop, in inches of water, across the HEPA filter (HEPA-351-4) during operation of each emissions unit. 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 HEPA filter (HEPA-351-4) on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the HEPA filter (HEPA-351-4) is 0.5 - 3 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the range based upon information obtained during future particulate emissions tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification. [OAC rule 3745-77-07(C)(1) and PTI #P0104582]

- (2) The permittee shall perform daily checks when emissions units P038 and/or P039 is/are in operation for any visible fugitive particulate emissions from "Block 4" of Building 351. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.



The permittee shall also perform daily checks of “Block 4” of Building 351 to ensure all doors, windows, roof vents, etc. are closed as required by b)(2)a.iii.

[OAC rule 3745-77-07(C)(1) and PTI #P0104582.

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of each emissions unit:

- a. each period of time (start time and date, and end time and date) when the pressure drop across the HEPA filter (HEPA-351-4) was outside of the acceptable range specified by this permit;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not controlled in accordance with the air filtration system specified by this permit;
- c. each incident of deviation described in (a) where a prompt investigation was not conducted;
- d. each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. [OAC rule 3745-77-07(C)(1) and PTI #P0104852]

(2) The permittee shall submit semiannual written reports that identify all days during which any visible fugitive particulate emissions were observed from “Block 4” of Building 351 and describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #P0104852]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

0.002 grain of filterable PM10/dscf



Applicable Compliance Method

The filterable gr/dscf limitation was established in accordance with a rated outlet concentration for the HEPA filter of the manufacturer's guaranteed grain loading.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. [OAC rule 3745-77-07(C)(1) and PTI #P0104852]

b. Emission Limitation

0.60 ton of filterable PM10/year

Applicable Compliance Method

The annual limitation was established by multiplying the maximum outlet concentration of 0.002 grain of filterable PM10/dscf by the maximum volumetric air flow rate of 8000 acfm and conversion factors of 1 lb/7000 grains, 60 minutes/hour, 8760 hours/year, and 1 ton/2000 lbs. Therefore, provided compliance is demonstrated with the 0.002 grain of filterable PM10/dscf limitation, compliance with the annual limitation shall also be demonstrated. [OAC rule 3745-77-07(C)(1) and PTI #P0104852]

c. Emission Limitation

Visible stack PE shall not exceed 0% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, the compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9. [OAC rule 3745-77-07(C)(1) and PTI #P0104852]

d. Emission Limitation

No visible fugitive PE from the building containing this emissions unit

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22. [OAC rule 3745-77-07(C)(1) and PTI #P0104852]

g) Miscellaneous Requirements

(1) None.



16. Emissions Unit Group -Boilers 5&6: B005,B006

EU ID	Operations, Property and/or Equipment Description
B005	93.80 mmBtu/hr coal fired boiler #5
B006	62.50 mmBtu/hr coal fired boiler #6

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity as six-minute average, except as provided by rule
b.	OAC rule 3745-17-10(C)(1)	See b)(2)a.
c.	OAC rule 3745-18-08(A)	See b)(2)a.
d.	OAC rule 3745-31-05(A)(3) (PTI #03-1167, issued 07/12/82)	1.60 lbs of sulfur dioxide (SO ₂)/mmBtu of actual heat input 0.62 lb of nitrogen oxide (NO _x)/mmBtu of actual heat input 0.03 lb of PE/mmBtu of actual heat input 0.08 lb of carbon monoxide (CO)/mmBtu of actual heat input The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
e.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See sections d) and e)
f.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 et seq.) [In accordance with 40 CFR 63.7499 this emissions unit is a pulverized coal/solid fossil fuel fired unit required to meet the subcategories of solid fuel, coal/solid fossil fuel and	The emissions from the boiler(s) shall not exceed the following emission limitations, as identified in the most recent amendment to 40 CFR Part 63, Subpart DDDDD, and as identified in:



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	pulverized coal/solid fuel in Table 2 of this subpart.]	<p>Table 2 for existing units:</p> <p>4.0E⁻⁰² lb of filterable particulate matter (PM)/MMBtu of heat input; or</p> <p>5.3E⁻⁰⁵ lb of Total Selected Metals (TSM)/MMBtu of heat input; and</p> <p>2.2E⁻⁰² lb of hydrogen chloride (HCl)/MMBtu of heat input; and</p> <p>5.7E⁻⁰⁶ lb of mercury (Hg)/MMBtu of heat input; and</p> <p>130 ppm carbon monoxide (CO) by volume on a dry basis, corrected to 3% O₂, 3-run average; or</p> <p>if using CEMS:</p> <p>320 ppm carbon monoxide (CO) by volume on a dry basis, corrected to 3% O₂, as a 30-day rolling average.</p> <p>OR output limits (option)</p> <p>4.2E⁻⁰² lb of PM/MMBtu of steam output; or</p> <p>4.9E⁻⁰¹ lb of PM/MWh; or</p> <p>5.6E⁻⁰⁵ lb of TSM/ MMBtu of steam output; or</p> <p>6.5E⁻⁰⁴ lb of TSM/MWh; and</p> <p>2.5E⁻⁰² lb of hydrogen chloride (HCl)/MMBtu of steam output; or</p> <p>0.27 lb HCl/MWh; and</p> <p>6.4E⁻⁰⁶ lb of mercury (Hg)/MMBtu of steam output; or</p> <p>7.3E⁻⁰⁵ lb Hg/MWh; and</p> <p>0.11 lb CO/MMBtu of steam output, 3-run average; or</p> <p>1.4 lb CO/MWh, 3-run average</p> <p>Boilers subject to emission standards in Table 2 shall also meet the work practice standards identified in Table 3 during startup and shutdown of the unit and the</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>tune-up requirements, as applicable, in Table 3.</p> <p>The permittee shall demonstrate compliance with the limits published in the final amendments to Subpart DDDDD, as required by the subpart.</p>

(2) Additional Terms and Conditions

- a. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- b. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
- c. The permittee shall comply with the applicable additional terms and conditions required under 40 CFR Part 63 Subpart DDDDD, including the following sections no later than January 31, 2016:

Applicable Rule	Requirement
40 CFR 63.7505	General requirements
40 CFR 63.7521	Fuel analyses, fuel specifications and procedures
40 CFR 63.7500	emission limits identified in Table 1 or 2; work practice standard in Tables 3; and operating limits in Table 4 to the subpart
40 CFR 63.7510	Initial compliance requirements
40 CFR 63.7530	Method(s) to demonstrate initial compliance with emission limitations, fuel specifications and work practice standards
40 CFR 63.7540	Method(s) to demonstrate continuous compliance with emission limitations, fuel specifications and work practice standards
40 CFR Part 63, Subpart DDDDD Table 10	The applicability of the General Provision in Part 63 Subpart A to boilers subject to



	Subpart DDDDD are identified in Table 10 to the subpart.
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c) Operational Restrictions

- (1) The quality of each shipment of coal received for burning in these emissions units shall have a sulfur content that is sufficient to comply with the allowable limitation specified in b)(1) above. [OAC rule 3745-77-07(A)(1)]
- (2) The permittee shall comply with the operational restrictions under 40 CFR Part 63 Subpart DDDDD, including the following sections no later than January 31, 2016:

Applicable Rule	Requirement
40 CFR 63.7525	Monitoring, installation, operation and maintenance requirements
40 CFR 63.7515	Subsequent performance tests, fuel analyses, or tune-ups
40 CFR 63.7520	Stack test and procedures to use
40 CFR 63.7500(a)(3)	The boiler and associated air pollution control and monitoring equipment must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart DDDDD]

d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit, until the compliance date in 40 CFR Part 63, Subpart DDDDD, is the opacity of the visible particulate emissions from the exhaust stack. The appropriate range of opacity defining proper function of the baghouse is an opacity less than 20%, as a six-minute average, except as otherwise provided by OAC rule 3745-17-07(A)(1)(b), (A)(2) and (A)(3).[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]
- (2) The permittee shall operate and maintain a continuous opacity monitoring system (COMS) to continuously monitor and record the opacity of the particulate emissions from these emissions units. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

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

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;



- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
- d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
- f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system that has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Northwest District Office upon request.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (3) Upon detecting an excursion or exceedance, the permittee shall restore operation of the emissions units (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown, or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of the excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) At all times, permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.



[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (6) The permittee shall monitor indicators to detect any bypass of the control device (or capture system) to the atmosphere.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (7) The permittee has developed an inspection and maintenance program for the baghouse as indicated below. At a minimum, the following shall be conducted:

- a. At least once every month, the permittee shall:
- i. Check the bags/filters for deterioration or degradation;
 - ii. Check the cleaning system for proper operation; and
 - iii. Check the hoppers and conveyance systems for proper operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (8) To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor that measures the temperature of the boiler exhaust gases entering the baghouse (a) during all periods of startup until the baghouse is operational or until the inlet temperature of the baghouse achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) during all periods of shutdown until the inlet temperature of the baghouse drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hard copy record of the temperatures during periods of startup and shutdown shall be maintained.

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, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in degrees Fahrenheit.

[OAC rules 3745-77-07(C)(1), 3745-17-07(A)(3)(a)(i) and 3745-17-07(A)(3)(b)(i)]

- (9) The permittee shall collect a representative grab sample from each shipment of coal as received. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal.

Each sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by



Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the Director (the Ohio EPA, Northwest District Office).

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

- (10) The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated SO₂ emission rate, in lbs/mmBtu, for each shipment of coal during a calendar month.

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

- (11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements under 40 CFR Part 63 Subpart DDDDD, including the following sections no later than January 31, 2016:

Applicable Rule	Requirement
40 CFR 63.7555; 40 CFR 63.7560; and 40 CFR 63.10(b)	The records required by the NESHAP are identified in 40 CFR 63.7555 and they must be kept for at least 5 years following the date of the record or report submitted.
40 CFR 63.7540(a)(2); and 40 CFR 63.7550(c)(4)	Records must be kept of the type and amount of all fuels burned in each boiler during each reporting period, in order to demonstrate that all fuel burned in each unit would either: result in lower emissions of HCl, Hg, or TSM than the applicable emission limit (if demonstrating compliance through fuel analyses) or result in a lower fuel input of Cl, Hg, or TSM than the maximum values calculated during the last performance test (if demonstrating compliance through performance testing).
40 CFR 63.7535	In order to demonstrate continuous compliance with the requirements of the NESHAP, the required monitoring and data collection systems must be operated at all times the affected source is in operation, except for periods of monitoring system malfunction, out of control periods, and required monitoring system quality assurance and/or control activities.
40 CFR 63.7533	If complying with the alternative equivalent steam output-based emission limits, instead of the heat input-based limits in Tables 1 or 2 to the subpart, the owner/operator may take credit for implementing energy conservation measures identified in the energy assessment by establishing a benchmark from which emission reduction credits may be generated. The requirements for documenting and calculating the differences between the established benchmark and reductions from energy conservation are identified in this section.



40 CFR 63.7541	Following the compliance date for existing sources, the owner/operator demonstrating compliance under the emissions averaging provisions, must demonstrate compliance on a continuous basis by meeting the requirements in this section.
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[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

e) Reporting Requirements

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

- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Northwest District Office, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.
- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous opacity monitor;
 - iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total operating time (hours) of the emissions unit;
 - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii. the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;



- viii. the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
- ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

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

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

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of the opacity limit

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) The permittee shall notify the Northwest District Office in writing of any record which shows a deviation of the allowable SO2 limitation, as shown by the calculated SO2 emission rates from section d). The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the deviation occurs.

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

- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63 Subpart DDDDD, including the following sections no later than January 31, 2016:

Applicable Rule	Requirement
40 CFR 63.7495(d); 40 CFR 63.7545; and 40 CFR 63.7530(f)	The notification requirements identified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (6), 40 CFR 63.9(b) through (h), and 40 CFR 63.7545 shall be submitted to the appropriate district office or local air agency no later than the date identified in 40 CFR 63.7545.
40 CFR 63.7550(a) and (b); and 40 CFR Part 63, Subpart DDDDD Table 9	The owner/operator must submit each compliance report identified in Table 9 to the NESHAP that is applicable to the boiler, either semiannually, annually, or biennially according to the requirements identified in 40 CFR 63.7550(b).
40 CFR 63.7550(c) through (h)	These paragraphs identify the information required to be submitted in the compliance reports.
CFR 63.7545(e); CFR 63.7515(g); CFR 63.7530(f); and OAC rule 3745-15-04(A)	A comprehensive written report on the results of performance tests and initial fuel analyses shall be submitted within 60 days after the completion of the test in the Notification of Compliance Status Report. Each report shall verify the unit has not changed or shall provide documentation of the revised parameters established during the performance test. However, Ohio rules require the testing results (signed by the person responsible for



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

	the tests) to be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).
40 CFR 63.7521(b)	The site-specific fuel analysis plan must be submitted no later than 60 days before the date of the intended initial compliance demonstration and it shall include the information identified in this paragraph.
40 CFR 63.7522(g)	If demonstrating compliance for existing units through emissions averaging, an implementation plan must be submitted in accordance with this paragraph no later than 180 days before demonstrating compliance using the emission averaging option.
40 CFR 63.7530(e)	The Notification of Compliance Status report must include a signed certification that an energy assessment was completed according to Table 3 to the subpart and that it is an accurate depiction of the facility.
40 CFR 63.7530(h)	If a boiler is subject to emission limits in Tables 1 or 2 to the subpart, must submit a signed statement in the Notification of Compliance Status report certifying that good combustion practices were employed during startup and shutdown periods and oxygen concentrations were maintained as specified by the manufacturer.
40 CFR 63.7533(d)	If establishing emissions credits for implementing energy conservation measures, the owner/operator must submit an Implementation Plan (to the appropriate district office or local air agency) for the energy conservation measures to be implemented and it must contain the information contained in this paragraph.
40 CFR 63.7525(k); and 40 CFR 63.7575 (definitions)	If meeting the requirements of a limited-use boiler the operating hours must be recorded and maintained for each unit that is operated under this scenario; and any exceedance of 876 hours of operation per year must be reported.
40 CFR 63.7550(h) and (i)	Within 60 days after the date of completing, results of relative accuracy test audit data and performance test data must be submitted electronically to EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (http://www.epa.gov/cdx). Performance test data must be submitted in the file format generated through EPA's Electronic Reporting Tool (ERT) at: http://www.epa.gov/ttn/chief/ert/index.html .
40 CFR 63.7540(b)	Each instance in which a boiler does not meet each/any applicable emission limit and/or operating limit in Tables 1 through 4 to the subpart, the owner/operator must report each as a deviation from the requirements of the Part 63 Subpart DDDDD, in accordance with 40 CFR 63.7550.



[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

0.03 lb of PE/mmBtu of actual heat input

Applicable Compliance Method

Compliance with the emission limitation above based upon the results of emission testing conducted in accordance with the testing requirements specified in section f)(2).

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

b. Emission Limitation

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1)(b).

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

c. Emission Limitation

1.60 lbs of SO₂/mmBtu of actual heat input

Applicable Compliance Method

Compliance with the SO₂ limitation may be demonstrated through the recordkeeping requirements in section d) of this permit and the applicable equation in OAC rule 3745-18-04(F).

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

d. Emission Limitation

0.62 lb of NO_x/mmBtu of actual heat input



Applicable Compliance Method

Compliance with the emission limitation above based upon the results of emission testing conducted in accordance with the testing requirements specified in section f)(2).

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

e. Emission Limitation

0.08 lb of CO/MMBtu of actual heat input

Applicable Compliance Method

Compliance with the emission limitation above based upon the results of emission testing conducted in accordance with the testing requirements specified in section f)(2).

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

f. Emission Limitations

4.0E⁻⁰² lb of filterable PM/MMBtu of heat input; or
5.3E⁻⁰⁵ lb of TSM/MMBtu of heat input; and
2.2E⁻⁰² lb of HCl/MMBtu of heat input; and
5.7E⁻⁰⁶ lb of Hg/MMBtu of heat input; and
130 ppm CO by volume on a dry basis, corrected to 3% O₂, 3-run average; or if using CEMS: 320 ppm CO by volume on a dry basis, corrected to 3% O₂, as a 30-day rolling average.

OR output limits (option)

4.2E⁻⁰² lb of PM/MMBtu of steam output; or
4.9E⁻⁰¹ lb of PM/MWh; or
5.6E⁻⁰⁵ lb of TSM/ MMBtu of steam output; or
6.5E⁻⁰⁴ lb of TSM/MWh; and
2.5E⁻⁰² lb of HCl/MMBtu of steam output; or
0.27 lb HCl/MWh; and
6.4E⁻⁰⁶ lb of Hg/MMBtu of steam output; or
7.3E⁻⁰⁵ lb Hg/MWh; and
0.11 lb CO/MMBtu of steam output, 3-run average; or
1.4 lb CO/MWh, 3-run average

Applicable Compliance Method:

The permittee shall conduct an initial performance test within 180 days after the compliance date to demonstrate compliance with the limitations in the NESHP. The appropriate tests methods from Table 5 to Subpart DDDDD shall be conducted.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart DDDDD]



- (2) 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 2½ years after issuance of this permit (the effective date).
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, NOx, and CO.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:
 - PE – Methods 1-5 of 40 CFR Part 60, Appendix A
 - NOx – Methods 1-4 and 7 of 40 CFR Part 60, Appendix A
 - CO – Methods 1-4 and 10 of 40 CFR Part 60, Appendix A
 - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance. The tests shall be conducted with emissions units B005 and B006 operating simultaneously.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. The Intent to Test notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Northwest District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person(s) responsible for the tests and submitted to the Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northwest District Office.

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



g) Miscellaneous Requirements

- (1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) The opacity monitoring requirements specified in 40 CFR 63.7525(b) and 63.7535 will replace the monitoring requirements of 40 CFR Part 64 and, therefore, the provisions of terms d)(1) through d)(6) will no longer apply after the compliance date in 40 CFR Part 63, Subpart DDDDD.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



17. Emissions Unit Group - Paint Booths: R001, R002

EU ID	Operations, Property and/or Equipment Description
R001	Service Garage Paint Booth (Building 317 – Maintenance of Forklifts, Small Machinery, etc.)
R002	Maintenance Paint Booth (Building 322 – Maintenance of Forklifts, Small Machinery, etc.)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)e. and g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a) (PTI No. P0103887, issued 5/19/09)	3.45 lbs organic compounds (OC)/hour from coating operations (for each emissions unit) 1,100.00 pounds OC/month from cleanup operations (for each emissions unit) See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI No. P0103887, issued 5/19/09)	6.90 tons OC per rolling 12-month period from coating operations (for each emissions unit) 6.60 tons OC per rolling 12-month period from cleanup operations (for each emissions unit) See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(1).
d.	OAC rule 3745-21-09(U)(1)(d)	3.5 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
e.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See g)(1).

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(C) and 3745-21-09(U)(1)(d).



- b. This permit establishes the following federally enforceable emission limitations for each emissions unit for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD):

- i. 6.90 tons OC per rolling 12-month period from coating operations based on a coating usage restriction of 4000 gallons per rolling 12-month period.
- ii. 6.60 tons OC per rolling 12-month period from cleanup operations based on a cleanup usage restriction of 2000 gallons per rolling 12-month period.

Rolling emission limitations for coating and cleanup usage were initially established in PTI No. P0103887 issued on 05/19/09. Since rolling usage records exist from this previously issued PTI, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The spray coating operation for these emissions units shall be controlled by a dry particulate filter. The permittee shall follow all of these work practices:

- a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration system with any modifications deemed necessary by the permittee during the time period in which the dry filtrations system is utilized.
- b. The permittee shall operate the dry filtration system in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- c. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the device is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.

In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

- d. The permittee shall document each inspection of the dry filtration system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.



- e. In the event that the dry filtration system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control device is not operating in accordance with such requirements.

Any documentation required under c)(1)d. and c)(1)e. shall be maintained for not less than five years, and shall be made available to Ohio EPA upon request.

[OAC rule 3745-77-07(A)(1) and PTI No. P0103887]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for coating material usage in emissions units R001 and R002:

- a. the name and identification number of each coating employed;
- b. the volatile organic compound (VOC) content of each coating (excluding water and exempt solvents), as applied, in pounds per gallon [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC₂];
- c. the number of gallons of each coating employed;
- d. the OC content of each coating, as applied, in pounds per gallon;
- e. the OC emission rate for each coating employed [d)(1)c. x d)(1)d.], in pounds;
- f. the total OC emission rate for all coatings employed [summation of d)(1)e. for all coatings], in pounds or tons;
- g. the rolling 12-month OC emission rates for all coatings employed, in tons;
- h. the rolling 12-month coating usage rate, in gallons.

[OAC rule 3745-77-07(C)(1) and PTI No. P0103887]

- (2) The permittee shall collect and record the following each month for cleanup operations in emissions units R001 and R002:

- a. the name and identification number of each cleanup material employed;
- b. the OC content on each cleanup material employed, in pounds per gallon;
- c. the number of gallons of each cleanup material employed;
- d. the total OC emissions from all the cleanup materials employed, in pounds [i.e., the sum of d)(2)b. x d)(2)c. for each cleanup material employed], prior to any credit claimed for solvent recycling;



- e. the rolling 12-month cleanup material usage rate, in gallons.

[OAC rule 3745-77-07(C)(1) and PTI No. P0103887]

- (3) If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling 12 month emission calculations, the permittee shall maintain the following monthly records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:

- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
- b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
- c. a record of the OC content of each cleanup solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the OC content of the material shipped;
- d. the mass (lbs) of OC to be credited to the OC emissions, from each shipment of recovered material, calculated using the lowest OC content of any cleanup solvent material recovered, unless a higher OC content is established from the testing results of the recovered material shipped [i.e., d)(3)b. x d)(3)c.], and the date of each such shipment or record of credit;
- e. the record of the total amount of OC emissions (in pounds) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the OC emission credits [d)(3)d.], for each shipment recorded during the month;
- f. the net OC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons [d)(3)d. – d)(3)e.], divided by 2,000 lbs/ton]; and
- g. the rolling 12-month OC emissions from the cleaning solutions employed, after any credit claimed for solvent recycling, in tons.

[OAC rule 3745-77-07(C)(1) and PTI No. P0103887]

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e. coatings that exceed the 3.5 lbs of VOC/gallon excluding water and exempt solvents) in these emissions units. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:



- a. All exceedances of the rolling 12-month VOC emission limitation of 6.90 tons from the coating operations for emissions units R001 and R002.
- b. All exceedances of the rolling 12-month VOC emission limitation of 6.60 tons from the cleanup operations for emissions units R001 and R002.
- c. All exceedances of the rolling 12-month coating usage of 4,000 gallons from the coating operations for emissions units R001 and R002.
- d. All exceedances of the rolling 12-month cleanup material usage of 2,000 gallons from the cleanup operations for emissions units R001 and R002.

These reports shall be submitted in accordance with the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. P0103887]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods for each emissions unit (R001 and R002):

- a. Emission Limitation

3.45 lbs of OC/hour; 6.90 tons of OC/rolling 12-month period (from coatings)

Applicable Compliance Method

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A.

*The potential to emit is based on a VOC content of 3.45 lbs/gallon and a maximum usage rate of 1.0 gallon/hour.

The annual limitation was established by multiplying the hourly limitation by a maximum operating schedule of 4000 hours/year, then dividing by 2000 lbs. Compliance with the annual limitation shall be determined through the recordkeeping requirements specified in section d)(1).

[OAC rule 3745-77-07(C)(1) and PTI No. P0103887]

- b. Emission Limitation

1,100.00 lbs of OC/month; 6.60 tons of OC/rolling 12-month period (from cleanup)



Applicable Compliance Method

Compliance with the monthly and rolling 12-month emission limitations shall be based upon the recordkeeping requirements specified in sections d)(2) and d)(3). [OAC rule 3745-77-07(C)(1) and PTI No. P0103887]

c. Emission Limitation

3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0103887]

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic air compound will be less than 1.0 ton per year. OAC rule Chapter 3745-31 requires permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant, as defined in OAC rule 3745-114-01 to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[PTI #P0103887]



18. Emissions Unit Group -Paint lines: K002,K003

EU ID	Operations, Property and/or Equipment Description
K002	Three downdraft spray booths
K003	Two paint spray booths

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)	3.5 pounds volatile organic compounds (VOC)/gallon coating, excluding water and exempt solvents
b.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).
c.	OAC rule 3745-31-05(A) (PTI #03-1196, issued 2/3/83, for K002) (PTI #03-03558, issued 5/4/88, for K003)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-09(U).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) Each coating employed in this emissions unit shall comply with the VOC emission limitation specified above on as “as applied” basis.

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

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

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]



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

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month:
 - a. The name and identification number of each coating, as applied; and
 - b. The VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

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

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;



- c. A description of any maintenance and repairs performed; and
- d. The name of the person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

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

- (2) The permittee shall submit quarterly deviation (excursion) reports showing that the dry particulate filter was not in service or not operated according to the manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions units were in operation. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

3.5 pounds of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(1) of this permit.



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

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

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of all coatings.

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

g) Miscellaneous Requirements

- (1) None.



19. Emissions Unit Group -SB13&14: P028,P029

EU ID	Operations, Property and/or Equipment Description
P028	Shotblast unit (SB-13) with cartridge filter.
P029	Shotblast unit (SB-14) with cartridge filter.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) (PTI #03-17360, modified and issued 01/29/08)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.001 grain per dry standard cubic foot (dscf) and 1.13 tons per year. Visible particulate emissions (PE) shall not exceed 0% opacity as a six-minute average. See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	40 CFR, Part 64 - Compliance Assurance Monitoring	See sections d) and e).

(2) Additional Terms and Conditions

a. Permit to Install No. 03-17360 for these air contaminant sources takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. use of a cartridge filter achieving a maximum outlet concentration of 0.001 grain/dscf of PM10* and an associated 0% opacity, as a six-minute average

The potential to emit (PTE), for these emissions units, is 1.13 tons of PM10/year. The annual PTE was determined by multiplying the maximum outlet concentration of 0.001 grain PM10/dscf by a maximum volumetric air flow of



30,000 acfm, applying the appropriate conversion factors of 7,000 grains/lb, 1 dscf/1acfm, and 60 minutes/hour, then multiplying by the maximum operating schedule of 8760 hrs/year and dividing by 2,000 lbs/ton.

*All particulate matter emissions are PM10.

- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The CAM plan, for these emissions units, has been developed for particulate emissions. The CAM performance indicator, for the cartridge filters controlling these emissions units, is daily visible emission checks. When the daily visible emission checks show operation outside of its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions units and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in section e)(1). The emissions units and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The cartridge filters shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]
 - (2) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the Northwest District Office and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]
 - (3) The permittee shall perform daily checks when these emissions units are in operation, and when the weather conditions allow, for any visible particulate emissions from the stacks serving these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.



[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) The permittee has developed an inspection and maintenance program for the cartridge filter as indicated below. At a minimum, the following shall be conducted:
 - a. At least once every month, the permittee shall:
 - i. Check the filters for deterioration or degradation;
 - ii. Check the cleaning system for proper operation; and
 - iii. Check the hoppers and conveyance systems for proper operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recordkeeping requirement is as stringent as or more stringent than the monitoring and recordkeeping requirements contained in PTI #03-17360 issued on 01/29/08: d)(3). The monitoring and recordkeeping requirements contained in the above-referenced PTI are subsumed into the monitoring and recordkeeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recordkeeping requirements in the PTI.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving these emissions units and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous six-month period.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirement is as stringent as or more stringent than the reporting requirements contained in PTI #03-17360 issued on 01/29/08: e)(1). The reporting requirements contained in the above-referenced PTI are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the PTI.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation

0.001 grain of PM10/dscf

Applicable Compliance Method

The outlet concentration was established in accordance with the manufacturer's guaranteed cartridge filter grain loading.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)(1) and PTI #03-17360]

b. Emission Limitation

1.13 tons of PM10/year

Applicable Compliance Method

The annual PTE was determined by multiplying the maximum outlet concentration of 0.001 grain of PM10/dscf by a maximum volumetric air flow of 30,000 acfm and conversion factors of 1 lb/7000 grains, 1 dscf/1 acfm, and 60 minutes/hour, a maximum operating schedule of 8760 hours/year, then dividing by 2000 lbs. Therefore, if compliance is shown with the grain of PM10/dscf limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-17360]

c. Emission Limitation

Visible PE shall not exceed 0% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-17360]

g) Miscellaneous Requirements

- (1) Based upon the results of a determination made under 40 CFR 64.7(d)(2), the Administrator or the permitting authority may require the permittee to develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



20. Emissions Unit Group -Structures paint lines: K001,K004

EU ID	Operations, Property and/or Equipment Description
K001	Miscellaneous metal parts spray coating line with downdraft water control system (PA-1).
K004	Miscellaneous metal parts spray coating line with downdraft water control system (PA-2).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI No. 03-13953, issued 12/9/03)	35.00 lbs organic compounds (OC)/hour from coating operations 100.80 tons OC/year from coating operations for emission units K001 and K004 combined 3,440.00 lbs OC/month and 20.64 tons OC/year from cleanup operations for emission units K001 and K004 combined 3.00 lbs particulate emissions (PE)/hour 8.64 tons PE/year for emissions units K001 and K004 combined (see b)(2)d.) Visible PE shall not exceed 0% opacity as a six-minute average See b)(2)c. Control Requirements (see b)(2)b.)
b.	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of volatile organic compounds (VOC)/gallon minus water and exempt solvents for extreme performance coating (daily volume-weighted average)
c.	OAC rule 3745-17-11(C)(3)	See b)(2)d.



- (2) Additional Terms and Conditions
 - a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
 - b. Best Available Technology (BAT) control requirements has been determined to be use of a dry filtration system for control of PE, with a minimum control efficiency of 90% for PE. BAT has also been determined to be compliance with the terms and conditions of this permit.
 - c. Particulate emissions are inclusive of and assumed to be less than 10 microns in size (PM10).
 - d. Any surface coating process with a permit-to-install issued after January 1, 1990 that identifies PE limitations and control measures based on BAT, shall comply with such limitations and measures instead of paragraphs (C)(1) and (C)(2) of OAC rule 3745-17-11(C).
- c) Operational Restrictions
 - (1) Each coating employed shall comply with the VOC emission limitation specified above on an "as applied" basis.
[OAC rule 3745-77-07(A)(1)]
 - (2) The permittee shall operate the dry filtration system whenever these emissions units are in operation.
[OAC rule 3745-77-07(A)(1) and PTI #03-13953]
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each day for each emissions unit:
 - a. the company name and identification of each coating material employed;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{voc,2}$.
[OAC rule 3745-77-07(C)(1) and PTI #03-13953]
 - (2) The permittee shall maintain monthly records of the following information for emissions units K001 and K004, combined:
 - a. the OC content of each coating as applied, in lbs/gallon;



- b. the number of gallons of each coating employed;
- c. the OC emission rate for each coating (sum of d)(2)a. x d)(2)b.), in lbs/month;
- d. the total OC emission rate for all coatings employed (sum of d)(2)c.) in lbs/month; and
- e. the annual OC emissions, in tons, for all coatings employed (sum of d)(2)d. for each calendar month to date from January to December).

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

- (3) The permittee shall maintain monthly records of the following information for emissions units K001 and K004, combined:

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed, in gallons;
- c. the OC content of each cleanup material employed, in lbs/gallon;
- d. the OC emission rate for each cleanup material employed (sum of d)(3)b. x d)(3)c.), in lbs/month;
- e. the total OC emission rate for all cleanup materials employed (sum of d)(3)d.) in lbs/month; and
- f. the annual OC emissions, in tons, for all cleanup materials employed (sum of d)(3)e. for each calendar month to date from January to December).

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

- (4) The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) – (total gallons of cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such



record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

- (2) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions units were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

- (3) The permittee shall submit annual reports that summarize the total annual OC emissions from coating and cleanup operations from emissions units K001 and K004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

35.00 lbs of OC/hour from coating operations

Applicable Compliance Method

The hourly limitation is based on the emissions unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance. If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A.

* The potential to emit for this emissions unit was based on a maximum OC content of 3.5 lbs/gallon and a maximum usage rate of 10 gallons/hour.

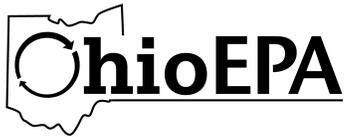
[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

- b. Emission Limitation

100.80 tons of OC/year from coating operations for K001 and K004 combined

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(2) of this permit.



[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

c. Emission Limitation

3,440.00 lbs of OC/month from cleanup operations for K001 and K004 combined

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(3) of this permit.

* The potential to emit was based on the maximum monthly cleanup usage rate of 500 gallons/month (from K001 and K004 combined) and a maximum OC content of 6.88 lbs of OC/gallon.

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

d. Emission Limitation

20.64 tons of OC/year from cleanup operations for K001 and K004 combined

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

e. Emission Limitation

3.5 pounds of VOC/gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

f. Emission Limitation

3.00 lbs of PE/hour

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly limitation by using the following equation:

$$E = (\text{maximum coating solids content, in lbs/gal}) \times (\text{maximum gallon usage rate}) \times (1 - TE) \times (1 - CE \text{ for dry filtration system})$$



Where

E = PE rate, in lbs/hour

Maximum Coating Solids Content = 8.57 lbs/gallon

Maximum Gallon Usage Rate = 10 gallons/hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 40%)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with U.S. EPA Methods 1-5 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

g. Emission Limitation

8.64 tons of PE/year from K001 and K004 combined

Applicable Compliance Method

The emission limitation was developed by multiplying a maximum emission rate of 9.00 lbs of PE/hour (from K001 and K004 combined) by a maximum annual operating schedule of 1920 hours/year* and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations for K001 and K004, compliance will also be shown with the annual limitation.

* 1920 hours/year represent a maximum operating schedule based on an inherent physical limitation. The maximum hours of operation for K001 and K004 are limited by the maximum production capacity of units at the facility.

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]

h. Emission Limitation

Visible PE shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13953]



Preliminary Proposed Title V Permit

Joint Systems Manufacturing Center

Permit Number: P0116413

Facility ID: 0302020027

Effective Date: To be entered upon final issuance

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of all coatings. [OAC rule 3745-77-07(C)(1)]

- g) Miscellaneous Requirements
 - (1) None.