



11/7/2014

Mr. Joseph Olivieri
Jay Plastics, Inc.
150 East Longview Avenue
Mansfield, OH 44903-4206

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0370010058
Permit Number: P0117861
Permit Type: Initial Installation
County: Richland

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Mansfield News-Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-NWDO; Canada

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Jay Plastics, Inc.

Issue Date: 11/7/2014
Permit Number: P0117861
Permit Type: Initial Installation
Permit Description: Initial Installation permit for P009, natural gas-fired 4SLB, spark-ignited RICE for use as a generated power supply (peak shaving).
Facility ID: 0370010058
Facility Location: Jay Plastics, Inc.
150 East Longview Avenue,
Mansfield, OH 44903-4206
Facility Description: All Other Plastics Product Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



Permit Strategy Write-Up
Jay Plastics, Inc.
Permit Number: P0117861
Facility ID: 0370010058



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: 9.361 mmBtu/hr (1531 HP) Natural Gas-Fired, 4-Stroke, Lean Burn (4SLB), Spark Ignition (SI), Reciprocating Internal Combustion Engine (RICE), manufactured after 7/1/2010, with Electronic Control Module
3. Facility Emissions and Attainment Status: Jay Plastics, Inc. is located in Richland County and is classified as a Title V facility because it is major for VOCs. This facility however is not major for HAPs. Richland County is designated attainment for all criteria pollutants.

The engine is subject to 40 CFR 60, Subpart JJJJ, because it was manufactured after July 1, 2007. The engine is subject to 40 CFR 63, Subpart ZZZZ as a new stationary RICE but meets the requirements of 40 CFR 63, subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ.

4. Source Emissions: The facility has requested a maximum annual operating restriction of 4,200 hours based upon a rolling 12-month summation in order to reduce potential air toxic emissions (specifically formaldehyde) below 1 ton/year to avoid dispersion modeling under ORC 3704.03(F).
5. Conclusion: In order to avoid air dispersion modeling requirements, federally enforceable restrictions and emission limits will be imposed on P009 to ensure HAP emissions remain below one ton per year for an individual HAP and ten tons/year for combined HAPs.
6. Please provide additional notes or comments as necessary:
None.
7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	TPY
NOx	0.59 ton NOx per month averaged over a 12-month rolling period
CO	1.18 tons CO per month averaged over a 12-month rolling period
VOC	0.41 ton VOC per month averaged over a 12-month rolling period
PM10	1.26×10^{-4} ton PM10 per month averaged over a 12-month rolling period
SO2	9.63×10^{-4} ton SO2 per month averaged over a 12-month rolling period



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Jay Plastics, Inc.**

Facility ID:	0370010058
Permit Number:	P0117861
Permit Type:	Initial Installation
Issued:	11/7/2014
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Jay Plastics, Inc.

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Draft Permit-to-Install
Jay Plastics, Inc.
Permit Number: P0117861
Facility ID: 0370010058

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0370010058
Facility Description: Miscellaneous plastic parts coating operations.
Application Number(s): A0052015
Permit Number: P0117861
Permit Description: Initial Installation permit for P009, natural gas-fired 4SLB, spark-ignited RICE for use as a generated power supply (peak shaving).
Permit Type: Initial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/7/2014
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Jay Plastics, Inc.
150 East Longview Avenue
Mansfield, OH 44903-4206

of a Permit-to-Install for the emissions unit(s) identified on the following page.

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 Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install
Jay Plastics, Inc.
Permit Number: P0117861
Facility ID: 0370010058

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0117861
Permit Description: Initial Installation permit for P009, natural gas-fired 4SLB, spark-ignited RICE for use as a generated power supply (peak shaving).

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P009
Company Equipment ID:	Generator #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install

Jay Plastics, Inc.

Permit Number: P0117861

Facility ID: 0370010058

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.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- 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.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted



local air agency, 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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
 - (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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual



obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions



Draft Permit-to-Install

Jay Plastics, Inc.

Permit Number: P0117861

Facility ID: 0370010058

Effective Date: To be entered upon final issuance

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.

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Jay Plastics, Inc.
Permit Number: P0117861
Facility ID: 0370010058

Effective Date: To be entered upon final issuance

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 permittee is advised that this facility is subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63 Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). Refer to 40 CFR 63.6590(c)(1) for specific requirements in this case. The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements have not been delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



Draft Permit-to-Install
Jay Plastics, Inc.
Permit Number: P0117861
Facility ID: 0370010058
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P009, Generator #2

Operations, Property and/or Equipment Description:

Generator #2 - 9.361 MMBtu/hr (1531 HP), natural gas-fired, 4SLB, spark-ignited RICE for use as a generated power supply (peak shaving).

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)h. and d)(5)

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)	See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxides (NO _x) emissions shall not exceed 0.59 ton per month averaged over a 12-month rolling period Carbon monoxide (CO) emissions shall not exceed 1.18 tons per month averaged over a 12-month rolling period Volatile organic compounds (VOC) emissions shall not exceed 0.41 ton per month averaged over a 12-month rolling period Particulate Matter ≤ 10 microns in size (PM ₁₀) emissions shall not exceed 1.26 x 10 ⁻⁴ ton per month averaged over a 12-month period Sulfur dioxide (SO ₂) emissions shall not exceed 9.63 x 10 ⁻⁴ ton per month averaged over a 12-month period See b)(2)b. and b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/0/06	See b)(2)d.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input
f.	OAC rule 3745-18-06	This emissions unit is exempt from the requirements of OAC rule 3745-18-06, pursuant to OAC rule 3745-18-06(A).
g.	OAC rule 110-03(F)	This emissions unit is exempt from the requirements of OAC rule 3745-110-03 pursuant to OAC rule 3745-110-03(J)(3).
h.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(5).
i.	40 CFR, Part 60, Subpart JJJJ In accordance with 40 CFR 60.4230, this emissions unit is subject to the New Source Performance Standards (NSPS) for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE). 40 CFR 60.4231(e) 40 CFR 60.4233(e) Table 1 to 40 CFR, Part 60, Subpart JJJJ	Uncertified, non-emergency, stationary, spark ignition, lean burn, internal combustion engine greater than 500 HP manufactured after July 1, 2010 The exhaust emissions from this engine shall not exceed: 1.0 grams of NO _x per horsepower hour (1.0 g NO _x /HP-hr) or 82 ppmvd at 15% O ₂ . 2.0 grams of CO per horsepower hour (2.0 g CO/HP-hr) or 270 ppmvd at 15% O ₂ . 0.7 gram of VOC per horsepower hour (0.7 g VOC/HP-hr) or 60 ppmvd at 15% O ₂ . See b)(2)e., c)(3), d)(4), e)(3) and f)(3)
j.	40 CFR 60.1 – 19 [40 CFR 60.4243]	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 60. 1-19 apply.
k.	40 CFR, Part 63, Subpart ZZZZ 40 CFR 63.6590(c)(1)	A new or reconstructed area source operating in compliance with Part 60 Subpart JJJJ is the demonstration of compliance for 40 CFR, Part, 63 Subpart ZZZZ.



(2) Additional Terms and Conditions

- a. This permit establishes a federally enforceable operational restriction on the hours of operation [See c)(1)] to ensure that formaldehyde emissions are in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4) through conformity with the Ohio EPA document entitled “Review of New Sources of Air Toxics Emissions, Option A” as indicated in ORC 3704.03(F)(4)(a). The federally enforceable operational restriction will result in no modeling being necessary to demonstrate compliance with the “Air Toxics Contaminant Statute”, ORC 3704.03(F)(4)(b) because the maximum annual emissions for all toxic air contaminants from P009 will be less than 1.0 ton per year [See d)(5)].
- b. The Best Available Technology (BAT) requirements under 3745-31-05(A)(3), as effective 11/30/01, for NO_x, CO, VOC, SO₂ and PM₁₀ emissions have been determined to be compliance with the emission limitations established in b)(1)a.
- c. The permittee has satisfied the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 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 US EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the US 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 US EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits no longer apply.
- d. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x, CO, VOC, SO₂ and PM₁₀ emissions from this air contaminant source since the potential to emit for each pollutant is less than ten tons per year, taking into account the federally enforceable restriction on the hours of operation.

- e. The permittee shall comply with the applicable requirements required under 40 CFR, Part 60, Subpart JJJ, including the following sections:

60.4233(e)	Emission standards for stationary spark ignition internal combustion engines equal to or greater than 100 HP.
60.4243(b)(2)(ii)	Keep a maintenance plan and records of conducted maintenance. Maintain and operate the engine in a manner consistent with good air pollution control practices for



	minimizing emissions. Conduct an initial performance test. Conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first.
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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)c.):

a. The maximum annual operating hours shall not exceed 4,200 hours, based upon a rolling, 12-month summation of the operating hours.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	466
1-2	932
1-3	1,398
1-4	1,864
1-5	2,330
1-6	2,796
1-7	3,262
1-8	4,194
1-9	4,200
1-10	4,200
1-11	4,200
1-12	4,200

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

(2) The permittee shall burn only natural gas in this emissions unit.

(3) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 60, Subpart JJJJ, including the following sections:



60.4243(g)	Operation and maintenance of air-to-fuel ratio controllers.
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d) Monitoring and/or Recordkeeping Requirements

- (1) For each day this emissions unit is operated, the permittee shall record the total hours of operation.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the total monthly operating hours (summation of the daily hours of operation for each calendar month);
 - b. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month; and
 - c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours.
- (3) 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.
- (4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR, Part 60, Subpart JJJJ, including the following sections:

60.4245(a)(1)	Maintain records of all notifications and documents supporting any notification required in this subpart.
60.4245(a)(2)	Maintain records of maintenance conducted on the engine.
60.4245(a)(4)	Maintain documentation that the engine meets the emission standards of this subpart.

- (5) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO 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



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contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; and
 - b. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.

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

- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4245(c)	Submit an initial notification as required in §60.7(a)(1), which includes the following: <ul style="list-style-type: none"> 1. name and address of the owner or operator; 2. the address of the affected source; 3. engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement; 4. emission control equipment; and 5. fuel used.
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f) Testing Requirements

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



a. Emission Limitations:

0.59 ton NOx per month averaged over a 12-month rolling period

1.18 tons CO per month averaged over a 12-month rolling period

0.41 ton VOC per month averaged over a 12-month rolling period

1.26×10^{-4} ton PM₁₀ per month averaged over a 12-month rolling period

9.63×10^{-4} ton SO₂ per month averaged over a 12-month rolling period

Applicable Compliance Method:

The above emission limitations were established based on 4,200 hours of operation per 12-month period and can be calculated, as follows:

For pollutants with emission factors specified in grams/bhp-hour:

gram pollutant ⁽¹⁾	1531 bhp-hr ⁽²⁾	4200 hours ⁽³⁾	1 pound ⁽⁴⁾	1 ton ⁽⁴⁾	1 year
bhp-hr		1 year	453.59 gram	2000 pounds	12-months

Where:

- (1) Pollutant-specific emission factor, as supplied by permittee.
- (2) Maximum capacity of the generator.
- (3) Restricted hours of operation.
- (4) Conversion rates.

For pollutants with emission factors specified in pounds/mmBtu:

pound pollutant ⁽¹⁾	9.361 mmBtu ⁽²⁾	4200 hours ⁽³⁾	1 ton ⁽⁴⁾	1 year
mmBtu	hour	12-months	2000 pounds	12-months

Where:

- (1) Emission factor from AP-42 Chapter 3.2 (7/00).
- (2) Maximum capacity of the generator.
- (3) Restricted hours of operation.
- (4) Conversion rate.



Therefore, provided compliance is shown with the gram/bhp-hour emission limitations and the rolling, 12-month, hours of operation restriction, compliance with the annual emission limitations shall also be demonstrated.

b. Emission Limitation:

Visible PE from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

c. Emission Limitation:

PE shall not exceed 0.062 lb/mmBtu of actual heat input

Applicable Compliance Method:

If required, compliance with the emission limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(10).

d. Emission Limitations:

1.0 grams NO_x /HP-hr or 82 ppmvd at 15% O₂

2.0 grams CO/HP-hr or 270 ppmvd at 15% O₂

0.7 gram VOC/HP-hr or 60 ppmvd at 15% O₂

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable NO_x, CO, and VOC emission limitations above based on the results of emission testing conducted in accordance with section f)(2) of this permit.

The above emission limitations were established in accordance with the emission standards established pursuant to 40 CFR, Part 60, Subpart JJJJ. The emission limitations are reflective of emission control techniques from the use of appropriate air/fuel ratios and electronic control module (ECM) for fuel metering.

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

- a. If the natural gas engine was purchased without an EPA certificate of conformity or is not operated as identified in the certificate of conformity or warranty for the emissions, the engine(s) will need to meet the performance testing requirements of 40 CFR 60.4243(b)(2) and the permittee will be required to conduct an initial performance test and subsequent performance tests every 8,760 hours or 3



years whichever comes first, to demonstrate compliance with the emission limits from Part 60 Subpart JJJJ.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for: NO_x, CO, and VOC.
- c. Methods 1-4 and the following additional test methods from 40 CFR, Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rates:
- d.

<u>Pollutant</u>	<u>Test Method</u>
NO _x	Method 7
CO	Method 10
VOC	Methods 18, 25, or 25A, as appropriate
- e. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.
- f. 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.
- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- h. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the



appropriate Ohio EPA District Office or local air agency within 60 days following completion of the test(s) pursuant to §60.4245(d).

- (3) The permittee shall comply with the applicable testing requirements under 40 CFR, Part 60, Subpart JJJJ, including the following sections:

60.4244(a) through (g)	Performance test procedures.
60.4245(d)	Submit a copy of each performance test conducted pursuant to this subpart within 60 days after the test has been completed.

g) Miscellaneous Requirements

- (1) None.