



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL
LUCAS COUNTY
Application No: 04-1174**

CERTIFIED MAIL

DATE: August 11, 1999

Enviro Inc
Tom Schmoyer
PO Box 1325
Birmingham, MI 48012

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

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



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

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
TOLEDO DIVISION OF ENVIRONMENTAL SERVICES
Indiana Office of Air Management
Michigan Department of Environmental Quality

Toledo Metropolitan Area Council of Governments

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

**Terms and
Conditions**

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

DRAFT PERMIT TO INSTALL 04-1174

Application Number: 04-1174
APS Premise Number: 0448011694
Permit Fee: **To be entered upon final issuance**
Name of Facility: Enviro Inc
Person to Contact: Tom Schmoyer
Address: PO Box 1325
Birmingham, MI 48012

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3031 Front Street
Toledo, Ohio**

Description of proposed emissions unit(s):
VACUUM CARDBOARD SEPARATOR DRIVEN BY A 90 HP GASOLINE ENGINE.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is

made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	79
NO _x	2.0
PM	1.4
SO ₂	0.11
VOC	3.9

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11(B)(5) OAC rule 3745-18-06(G) OAC rule 3745-21-07(B) OAC rule 3745-21-08(B) OAC rule 3745-23-06(B)
Vacuum cardboard separator	OAC rule 3745-31-05	
	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	
90 horsepower gasoline engine	OAC rule 3745-31-05	

OAC rule 3745-17-07(A)(1)

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Applicable Emissions
Limitations/Control Measures

no visible particulate emissions from the source,
0.63 pound of particulates per hour, and
1.3 tons of particulates per year.

see Section A.2.a.
see Section A.2.a.

20 percent opacity as a 6-minute average,
0.065 pound of particulates per hour,
0.13 ton of particulates per year,
0.053 pound of sulfur dioxide per hour,
0.11 ton of sulfur dioxide per year,
1.9 pounds of volatile organic compounds (VOC) per hour,
3.9 tons of VOC per year,
40 pounds of carbon monoxide per hour,
79 tons of carbon monoxide per year,
0.99 pound of nitrogen oxides per hour, and
2.0 tons of nitrogen oxides per year.

see Section A.2.a.
see Section A.2.a
see Section A.2.a.
see Section A.2.a
see Section A.2.a.
see Section A.2.a

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2. Additional Terms and Conditions

2.a The emissions limitation established by this applicable regulation is equivalent with, or less stringent than, the limitation established by the best available technology (BAT) determination of OAC rule 3745-31-05.

B. Operational Restrictions

1. The permittee shall use only gasoline fuel for combustion in this emissions unit.
2. The permittee shall maintain and operate a dropout box enclosure of the blower discharge at all times when the emissions unit is in operation. This enclosure shall be adequate to eliminate visible emissions at the source.
3. The maximum annual operating hours for this emissions unit shall not exceed 4,000 hours, based upon a rolling, 12-month summation of the operating hours.

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

Month	Maximum Allowable Cumulative Operating Hours
1	300
1-2	700
1-3	1,000
1-4	1,300
1-5	1,700
1-6	2,000
1-7	2,300
1-8	2,700
1-9	3,000
1-10	3,300
1-11	3,700
1-12	4,000

After the first 12 calendar months of operation 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 rates.

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1. For each day during which the permittee burns a fuel other than gasoline, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain daily records that document any time periods when the dropout box was not in service when the emissions unit was in operation.
3. The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours.
 - c. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the operating hours for each calendar month.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than gasoline was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when the dropout box was not in service when the emissions unit was in operation. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section A.

E. Testing Requirements

Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):

1. Emission limitation:
no visible emissions.

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Applicable compliance method:

compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C.2. If required the permittee shall also demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(4).

2. Emission limitation:

0.63 lb/hr PM.

Applicable compliance method:

compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C.2. and the visible emissions limitation above.

3. Emission limitation:

1.3 tons/yr PM.

Applicable compliance method:

compliance shall be demonstrated through compliance with the emission limitation above and the monitoring and recordkeeping requirements of Section C.3.

4. Emission limitation:

20% opacity as a 6-minute average.

Applicable compliance method:

compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C.1. If required the permittee shall also demonstrate compliance through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1).

5. Emission limitation:

0.065 lb/hr PM.

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Applicable compliance method:

compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C.1., the use of the AP-42, Table 3.3-1 dated 10/96, emission factor of 0.000721 lb PM/hp-hour and the maximum horse-power rating of 90 hp. If required the permittee shall also demonstrate compliance through stack testing performed in accordance with OAC rule 3745-17-03(B)(10).

6. Emission limitation:

0.13 ton/yr PM.

Applicable compliance method:

compliance shall be demonstrated through compliance with the emission limitation above and the monitoring and recordkeeping requirements of Section C.3.

7. Emission limitation:

0.053 lb SO_x per hour.

Applicable compliance method:

compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C.1., the use of the AP-42, Table 3.3-1 dated 10/96, emission factor of 0.000591 lb SO_x/hp-hour and the maximum horse-power rating of 90 hp. If required the permittee shall also demonstrate compliance through stack testing performed in accordance with OAC rule 3745-18-04(E)(1).

8. Emission limitation:

0.11 ton/yr SO_x.

Applicable compliance method:

compliance shall be demonstrated through compliance with the emission limitation above and the monitoring and recordkeeping requirements of Section C.3.

9. Emission limitation:

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1.9 lbs/hr VOC.

Applicable compliance method:

compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C.1., the use of the AP-42, Table 3.3-1 dated 10/96, emission factor of 0.0216 lb TOC/hp-hour and the maximum horse-power rating of 90 hp. If required the permittee shall also demonstrate compliance through stack testing performed in accordance with Method 25 of 40 CFR Part 60, Appendix A.

10. Emission limitation:

3.9 tons/yr VOC.

Applicable compliance method:

compliance shall be demonstrated through compliance with the emission limitation above and the monitoring and recordkeeping requirements of Section C.3.

11. Emission limitation:

40 lbs/hr CO.

Applicable compliance method:

compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C.1., the use of the AP-42, Table 3.3-1 dated 10/96, emission factor of 0.439 lb CO/hp-hour and the maximum horse-power rating of 90 hp. If required the permittee shall also demonstrate compliance through stack testing performed in accordance with Method 10 of 40 CFR Part 60, Appendix A.

12. Emission limitation:

79 tons/yr CO.

Applicable compliance method:

compliance shall be demonstrated through compliance with the emission limitation above and the monitoring and recordkeeping requirements of Section C.3.

13. Emission limitation:

0.99 lb/hr NO_x.

Applicable compliance method:

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compliance shall be demonstrated through the monitoring and recordkeeping requirements of Section C.1., the use of the AP-42, Table 3.3-1 dated 10/96, emission factor of 0.011 lb NO_x/hp-hour and the maximum horse-power rating of 90 hp. If required the permittee shall also demonstrate compliance through stack testing performed in accordance with Method 7 of 40 CFR Part 60, Appendix A.

14. Emission limitation:

2.0 tons/yr NO_x.

Applicable compliance method:

compliance shall be demonstrated through compliance with the emission limitation above and the monitoring and recordkeeping requirements of Section C.3.

F. Miscellaneous Requirements

None.