



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Craig W. Butler, Director

10/9/2015

Ron Grannan
 Industrial Container Services - OH, LLC
 1385 Blatt Blvd
 Gahanna, OH 43230

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0125070213
 Permit Number: P0119505
 Permit Type: Administrative Modification
 County: Franklin

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	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:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 77 South High Street, 17th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

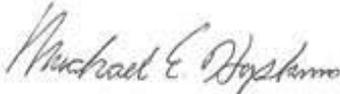
Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA
Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Industrial Container Services - OH, LLC**

Facility ID:	0125070213
Permit Number:	P0119505
Permit Type:	Administrative Modification
Issued:	10/9/2015
Effective:	10/9/2015



Division of Air Pollution Control
Permit-to-Install
for
Industrial Container Services - OH, LLC

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Final Permit-to-Install
Industrial Container Services - OH, LLC
Permit Number: P0119505
Facility ID: 0125070213
Effective Date: 10/9/2015

Authorization

Facility ID: 0125070213
Facility Description: Repair shops and related services, n.e.c.
Application Number(s): M0003590
Permit Number: P0119505
Permit Description: Administrative modification to change required afterburner minimum temperature based on stack test results.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 10/9/2015
Effective Date: 10/9/2015

This document constitutes issuance to:

Industrial Container Services - OH, LLC
1385 Blatt Boulevard
Gahanna Industrial Park
Gahanna, OH 43230

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

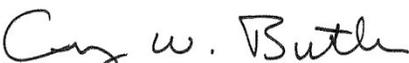
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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



Final Permit-to-Install
Industrial Container Services - OH, LLC
Permit Number: P0119505
Facility ID: 0125070213
Effective Date: 10/9/2015

Authorization (continued)

Permit Number: P0119505

Permit Description: Administrative modification to change required afterburner minimum temperature based on stack test results.

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

Emissions Unit ID:	N002
Company Equipment ID:	Thermal Oxidizer
Superseded Permit Number:	01-6852
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Industrial Container Services - OH, LLC
Permit Number: P0119505
Facility ID: 0125070213
Effective Date: 10/9/2015

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, Central 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, Central District Office. The written reports shall be submitted (i.e., postmarked) 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, Central 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, Central 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, Central 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, Central 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, Central 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

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.



Final Permit-to-Install
Industrial Container Services - OH, LLC
Permit Number: P0119505
Facility ID: 0125070213
Effective Date: 10/9/2015

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Industrial Container Services - OH, LLC
Permit Number: P0119505
Facility ID: 0125070213
Effective Date: 10/9/2015

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.



Final Permit-to-Install
Industrial Container Services - OH, LLC
Permit Number: P0119505
Facility ID: 0125070213
Effective Date: 10/9/2015

C. Emissions Unit Terms and Conditions



1. N002, Thermal Oxidizer

Operations, Property and/or Equipment Description:

19.2 MMBtu/hr drum reclamation furnace.

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# 01-06852)	Particulate emissions shall not exceed 4.9 pounds per hour and 10.57 tons per year. PM-10 emissions shall not exceed 4.4 pounds per hour. Organic Compound (OC) emissions shall not exceed 9.0 pounds per hour. Carbon Monoxide (CO) emissions shall not exceed 50 ppmv on an hourly average basis. CO emissions shall not exceed 2.97 pounds per hour and 8.25 tons per year. Sulfur dioxide emissions shall not exceed 3.9 pounds per hour and 16.9 tons per year. Nitrogen oxides (NOx) emissions shall not exceed 10.5 pounds per hour and 29.2 tons per year. Metals limits: As emissions shall not exceed 0.0042 pound per hour and 0.0091 ton per year.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Be shall not exceed 0.0005 pound per hour and 0.0011 ton per year.</p> <p>Cd emissions shall not exceed 0.010 pound per hour and 0.022 ton per year.</p> <p>Cr emissions shall not exceed 0.004 pound per hour and 0.0076 ton per year.</p> <p>Pb emissions shall not exceed 0.052 pound per hour and 0.11 ton per year.</p> <p>Hg emissions shall not exceed 0.005 pound per hour and 0.011 ton per year.</p> <p>Ni emissions shall not exceed 0.0076 pound per hour and 0.02 ton per year.</p> <p>Visible particulate emissions shall not exceed 5 percent opacity as a 6-minute average.</p> <p>OC emissions shall be controlled by a minimum overall control efficiency of 95%.</p> <p>The Thermal oxidizer controlling emissions from N002 shall operate with a minimum control efficiency of 95%.</p> <p>This emissions unit shall not feed production for more than 83 hours per week.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-09(B) and (C).</p>
b.	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per 100 pounds of salvageable material.
c.	OAC rule 3745-17-09(C)	This emissions unit shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3)

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) for this emissions unit includes the use of a permanent total enclosure (PTE) for capturing the OC emissions from the drum handling building and drum furnace with the venting of the captured emissions from the drum handling building and the drum reclamation furnace to add-on organic compound (OC) emission controls which maintain a minimum destruction and removal (DRE) efficiency of 95 percent by weight. (The current OC emission control consists of a thermal oxidizer)
- b. The permittee shall maintain the monitoring plan for the OC capture system submitted to the Ohio EPA, Central District Office on September 24, 1996. The plan includes the following:
 - i. the parameter (identified as a PTE differential pressure) to be continuously measured and recorded for verifying the OC emissions capture efficiency;
 - ii. the manufacturer of the monitoring device and recording instrumentation; and
 - iii. The Quality Assurance/Quality Control (QA/QC) plan to ensure that the monitor is maintained and operated in accordance with manufacturer's specifications.
- c. The permittee shall maintain and operate a monitoring system that continuously measures and records the value of the differential pressure to verify the OC capture rate during operation of this emissions unit

The total enclosure shall meet the design requirements set forth in USEPA guidance document EPA/4-91-010, Method 204 unless otherwise approved in writing by Ohio EPA and USEPA as indicated in the guidance document.

The permittee shall operate the monitoring and recording system anytime material handling is taking place or the drum reconditioning furnace is being operated for production purposes or for the completion of the burn down cycle.
- d. A statement of certification for the existing continuous CO monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 4. Proof

of certification shall be made available to the Ohio EPA, Central District Office upon request.

- e. The permittee shall maintain the Preventative Maintenance and Malfunction Abatement Plan (PM&MAP), submitted to the Ohio EPA, Central District Office on January 30, 1997 for the drum reconditioning process. The plan includes, at a minimum, monthly inspections using the PM and MAP procedures recommended by the equipment manufacturer. The inspection shall include a written report containing any needed repairs. Repairs shall be completed within 30 days of the inspection. If a time period longer than 30 days is needed to complete the repairs, the Ohio EPA, Central District Office shall be notified in writing. This notice shall list the repairs needed and the reason(s) the repairs could not be accomplished sooner.
 - f. The permittee shall maintain the drum inspection plan submitted to the Ohio EPA, Central District Office on July 30, 1996. The inspection procedure includes the following:
 - i. a description of the inspection method used to ensure that drums not meeting the RCRA definition of empty are not processed; and,
 - ii. a description of the training which inspectors or operators are given to allow them to identify non RCRA empty drums.
 - g. The design of this emissions unit shall meet good engineering practices so as not to cause excessive exhaust gas concentrations of any air contaminant.
- c) Operational Restrictions
- (1) The thermal oxidizer shall provide at least 0.5 second of retention time and a combustion chamber exhaust gas temperature of not less than 1618 degrees Fahrenheit.
 - (2) The interlock device which prevents the feed of drums until the thermal oxidizer's exhaust gas temperature has reached 1618 degrees Fahrenheit shall be functioning at all times.
 - (3) Burners within the drum reclamation furnace and thermal oxidizer are permitted to operate during non-production periods in order to prevent excessive heating and cooling of refractory. During these non-production periods, the thermal oxidizer shall be maintained at a minimum temperature of 1618 degrees Fahrenheit until all wastes are completely combusted and the burn-down cycle is complete. For the purposes of this permit, the burn down cycle is defined as the operating time in which the drum reclamation furnace is operable; however, material handling and the feeding of drums has ceased, and the furnace is being operated to ensure complete combustion of all residual waste.
 - (4) The permittee shall not process any drum in this emissions unit that does not meet the RCRA definition of empty as specified in OAC rule 3745-51-07.

- (5) At a minimum, at least one spare thermocouple and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- (6) If the drum reconditioning process is in need of repairs it shall not be operated of operation will result in the exceedance of any term and condition detailed in this permit.

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.
- (2) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the combustion temperature on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.
- (3) Whenever the monitored combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. 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/limit specified in this permit, 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:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do 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 temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office . The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

- (4) The permittee shall maintain a log book for this emissions unit which will be used to record the date, time of start-up, time of shutdown and recording person's signature. The permittee shall also record in the log book the total number of hours of operation each week for this emissions unit.

Start-up is defined as the time in which material handling or drum reconditioning has begun. Shutdown is defined as the time at which the burn down cycle is complete.

- (5) The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60.

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

- a. emissions of CO in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of CO in units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits;

- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous CO monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous CO monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous CO monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the combustion temperature within the thermal oxidizer was outside of the acceptable range;
 - 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 vented to the thermal oxidizer;
 - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s).
- (2) 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 eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District

Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) The permittee shall submit quarterly reports that summarize the total number of hours of operation during each week for the previous calendar quarter. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (4) The permittee shall submit annual reports which specify the total emissions of particulates, carbon monoxide, sulfur dioxide, nitrogen oxides, AS, Be, Cd, Cr, Pb, Hg, and Ni from this emissions unit for the previous calendar year. These annual reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
- (5) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 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 Ohio EPA, Central District Office, documenting all instances of CO emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
 - 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 CO and other associated monitors;
 - iii. continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS 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 CO emissions for the calendar quarter (tons);
 - vi. the total operating time (hours) of the emissions unit;

- vii. the total operating time of the continuous CO monitoring system while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction** of the continuous CO monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous CO monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

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

* where no excess emissions have 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 EER quarterly report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

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: Particulate emissions shall not exceed 4.9 pounds per hour; Organic Compound (OC) emissions shall not exceed 9.0 pounds per hour; CO emissions shall not exceed 2.97 pounds per hour; Nitrogen oxides (NO_x) emissions shall not exceed 10.5 pounds per hour; As emissions shall not exceed 0.0042 pound per hour; Be shall not exceed 0.0005 pound per hour; Cd emissions shall not exceed 0.010 pound per hour; Cr emissions shall not exceed 0.004 pound per hour; Pb emissions shall not exceed 0.052 pound per hour; Hg emissions shall not exceed 0.005 pound per hour; and Ni emissions shall not exceed 0.0076 pound per hour.

Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE, CO, NO_x, SO₂, VOC and metals
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for:
 - PE, Methods 1-5 of 40 CFR Part 60, Appendix A.
 - NO_x, Methods 1-4 and 7E of 40 CFR Part 60, Appendix A.
 - CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A
 - VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A
 - Metals, Methods 1-4 and 29 of 40 CFR Part 60, Appendix A
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, CDO.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central 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 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, Central District Office's refusal to accept the results of the emission test(s).
- vi. Personnel from the Ohio EPA, Central District Office 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.
- vii. 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for

the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- b. Emissions Limitation: OC emissions shall be controlled by a minimum overall control efficiency of 95%. The Thermal oxidizer controlling emissions from N002 shall operate with a minimum control efficiency of 95%.

Applicable Compliance Method: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration..
- ii. The following test method(s) shall be employed to determine the capture and control efficiency of the thermal incinerator: 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A, as appropriate and 40CFR Part 51, Appendix M, Method 204.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- iii. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, CDO.
- iv. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central 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 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, Central District Office's refusal to accept the results of the emission test(s).

- v. Personnel from the Ohio EPA, Central District Office 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.
- vi. 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 Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.
- c. Emissions Limitation: 50 ppmv CO on an hourly average basis.

Applicable Compliance Method: Compliance shall be demonstrated through the use of the CEM data recorded in section d)(5).
- d. Emissions Limitation: PM-10 emissions shall not exceed 4.4 pounds per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 40 CFR Part 51, Appendix M, method 201.
- e. Emissions Limitation: Sulfur dioxide emissions shall not exceed 3.9 pounds per hour;

Applicable Compliance Method: Compliance with the hourly sulfur dioxide emissions limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of 5,000 scf/hr by the AP-42 (Supplement D, 7/98, Table 1.4-2) emission factor of 0.6 lb SO₂/10⁶ scf.
- f. Emissions Limitation: Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified OAC rule 3745-17-03(B)(1).
- g. Emissions Limitation: Particulate emissions shall not exceed 10.57 tons per year; CO emissions shall not exceed 8.25 tons per year; Sulfur dioxide emissions shall not exceed 16.9 tons per year; Nitrogen oxides (NO_x) emissions shall not exceed 10.5 pounds per hour and 29.2 tons per year; As emissions shall not exceed



0.0091 ton per year; Be shall not exceed 0.0011 ton per year; Cd emissions shall not exceed 0.022 ton per year; Cr emissions shall not exceed 0.0076 ton per year; Pb emissions shall not exceed 0.11 ton per year; Hg emissions shall not exceed 0.011 ton per year; Ni emissions shall not exceed 0.02 ton per year.

Applicable Compliance Method: Compliance with the annual emissions limitations shall be assumed as long as compliance is maintained with the 83 hour per week operational limitation.

- g) Miscellaneous Requirements
 - (1) None.