



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
SUMMIT COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 16-02470**

**Fac ID: 1677010265**

**DATE: 1/25/2007**

ITW Ride Quality Products  
Pete Giles  
1624 Englewood Ave  
Akron, OH 44305

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action of the Director is final 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 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  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

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

CC: USEPA

ARAQMD



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install**

**Issue Date: 1/25/2007**

**FINAL PERMIT TO INSTALL 16-02470**

Application Number: 16-02470  
Facility ID: 1677010265  
Permit Fee: **\$400**  
Name of Facility: ITW Ride Quality Products  
Person to Contact: Pete Giles  
Address: 1624 Englewood Ave  
Akron, OH 44305

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1624 Englewood Ave  
Akron, Ohio**

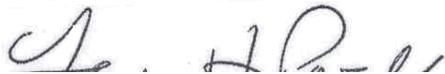
Description of proposed emissions unit(s):

**Diesel Fired Electrical Generator.**

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



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Laura Powell  
Acting 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

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 (i.e., postmarked) 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.)

#### 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)**

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

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

#### **10. Public Disclosure**

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

#### **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **12. Best Available Technology**

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**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               | 1.84                 |
| NOx              | 6.42                 |
| OC               | 0.11                 |
| PE               | 0.18                 |

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**total combined**  
**HAPs**  
**SO2**

**0.11**

**0.11**

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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,<br/>and/or Equipment</u>   | <u>Applicable Rules/Requirements</u>   |
|---|--|
| B004 - Caterpillar Model No.<br>3304B diesel-fired electric<br>generator - CAT Generator 1. | OAC rule 3745-31-05(A)(3)<br><br>OAC rule 3745-35-07(B)(1)<br>(synthetic minor to avoid Title V) |

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|                              | <u>Applicable Emissions<br/>Limitations/Control Measures</u>   |   |
|------------------------------|--|---|
| OAC rule 3745-17-07(A)       | Nitrogen oxide (NOx) emissions shall not exceed 3.67 pounds per hour.  | CO emissions shall not exceed 1.84 tons per year, based upon a rolling, 12-month summation.<br><br>OC emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation. |
| OAC rule 3745-17-11(B)(5)(a) | Carbon monoxide (CO) emissions shall not exceed 1.05 pounds per hour.  | SO2 emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation.   |
| OAC rule 3745-18-06(B)       | Organic compounds (OC) emissions shall not exceed 0.06 pound per hour.<br><br>Sulfur dioxide (SO2) emissions shall not exceed 0.06 pound per hour. | The total combined HAPs emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation.   |
| OAC rule 3745-23-06(B)       | The total combined hazardous air pollutants (HAPs) emissions shall not exceed 0.06 pound per hour.   | PE shall not exceed 0.18 ton per year, based upon a rolling, 12-month summation.  |
| OAC rule 3745-21-08(B)       | The particulate emissions (PE) from the engine's exhaust shall not exceed 0.09 pound per million Btu of actual heat input.                         | See B.1 and B.2 below.  |
| OAC rule 3745-21-08(B)       | PE shall not exceed 0.10 pound per hour.   | The emission limitation based on this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.   |
| OAC rule 3745-21-08(B)       | Visible PE from any stack shall not exceed 10 percent opacity, as a six-minute average.  | The emission limitation based on this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.   |
|                              | NOx emissions shall not exceed 6.42 tons per year, based upon a rolling, 12-month summation.   | This emissions unit is exempt from OAC rule 3745-18-06(G) because the stationary internal combustion engine has a rated heat input  |

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capacity less than 10 MM Btu  
per hour total rated capacity.

See A.2.b.

See A.2.c.

**2. Additional Terms and Conditions**

- 2.a** The hourly NO<sub>x</sub>, CO, OC, SO<sub>2</sub>, and total combined HAPs emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

**B. Operational Restrictions**

1. This emissions unit shall be operated with diesel fuel with a sulfur content less than or equal to 0.05% by weight.
2. The maximum annual operating hours for this emissions unit shall not exceed 3500, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during 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<br/>Cumulative Operating Hours</u> |
|-----------------|---|
| 1               | 350   |
| 1-2             | 700   |
| 1-3             | 1150  |
| 1-4             | 1500  |
| 1-5             | 1850  |
| 1-6             | 2200  |
| 1-7             | 2550  |
| 1-8             | 2900  |
| 1-9             | 3250  |
| 1-10            | 3500  |
| 1-11            | 3500  |
| 1-12            | 3500  |

After 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.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit.
2. The permittee shall maintain monthly records of the following information:
  - a. the number of hours of operation for each month; and

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- b. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month number of hours of operation.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative numbers of hours of operation for each calendar month.

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

1. The permittee shall submit quarterly deviation (excursion) reports which identify each day when a fuel that did not meet the requirements of section B.1 of this permit was burned in this emissions unit.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month restriction on the number of hours of operation; and for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative numbers of hours of operation.
3. These quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

NOx emissions shall not exceed 3.67 pounds per hour.

Applicable Compliance Method:

The hourly allowable emission limitation above was established based on the results (1664 grams/hr) of testing at 100% load.

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation based on the results of emission testing conducted in accordance with Methods 1-4, and 7, 7A, 7C, or 7E, as appropriate, of 40 CFR Part 60, Appendix A.

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b. Emission Limitation:

CO emissions shall not exceed 1.05 pounds per hour.

Applicable Compliance Method:

The hourly allowable emission limitation above was established based on the results (476 grams/hr) of testing at 100% load.

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

c. Emission Limitation:

OC emissions shall not exceed 0.06 pound per hour.

Emissions Unit ID: B004

Applicable Compliance Method:

The hourly allowable emission limitation above was established based on the results (27 grams/hr) of testing at 100% load.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 0.06 pound per hour.

Applicable Compliance Method:

The hourly allowable emission limitation above was established based on multiplying the emission factor\* of 0.007 lb SO<sub>2</sub>/gallon of oil by the maximum hourly number of gallons of oil used (9 gallons/hr).

If required, the permittee shall demonstrate compliance with the hourly allowable SO<sub>2</sub> emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 6 or 6C, as appropriate, of 40 CFR Part 60, Appendix A.

\* This emission factor was developed based on multiplying the maximum sulfur content in oil (0.0005) by the density of oil (7 lbs/gallon) and by 1 gallon, and then by 2 (for every pound of sulfur burned, 2 pounds of SO<sub>2</sub> are produced).

e. Emission Limitation:

The total combined HAPs\* emissions shall not exceed 0.06 pound per hour.

Applicable Compliance Method:

The hourly allowable emission limitation above was established based on the results (27 grams/hr) of testing at 100% load.

If required, the permittee shall demonstrate compliance with the hourly allowable total combined HAPs emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

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\* All OC/VOCs are assumed to be HAPs.

f. Emission Limitation:

The PE from the engine's exhaust shall not exceed 0.09 pound per million Btu of actual heat input.

Applicable Compliance Method:

The lb PE/mmBtu allowable limitation above was established based on the results [45 grams/hr (0.099 lb/hr)] of testing at 100% load, and the maximum heat input (1.16 mmBtu/hr).\*

If required, the permittee shall demonstrate compliance with the allowable pound of PE per million Btu of actual heat input emission limitation based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

\*  $0.09 \text{ lb/mmBtu} = 0.099 \text{ lb/hr}$  divided by the maximum heat input (1.16 mmBtu/hr)\*\*

\*\* The maximum heat input was calculated based on multiplying the oil heat content (18,390 Btu/lb) by the hourly maximum number of gallons of oil used (9 gallons/hr) and by the density of oil (7 lbs/gallon), and then dividing by 1,000,000.

g. Emission Limitation:

PE shall not exceed 0.10 pound per hour.

Applicable Compliance Method:

The hourly allowable emission limitation above was established based on the results (45 grams/hr) of testing at 100% load.

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

h. Emission Limitation:

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Visible PE from any stack shall not exceed 10% opacity as a six-minute average.

Applicable Compliance Method:

Compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

i. Emission Limitations:

NO<sub>x</sub> emissions shall not exceed 6.42 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

CO emissions shall not exceed 1.84 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

OC emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation of the monthly emissions.

SO<sub>2</sub> emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation of the monthly emissions.

The total combined HAPs emissions shall not exceed 0.11 ton per year, based upon a rolling, 12-month summation of the monthly emissions.

PE shall not exceed 0.18 ton per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual allowable emission limitations above were determined by multiplying the hourly allowable emission limitation by the maximum annual allowable operating hours (3500 hours per year, as a rolling, 12-month summation), and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitations and the annual allowable operating hours are maintained, compliance with the annual allowable emission limitations shall be assumed.

**F. Miscellaneous Requirements**

Emissions Unit ID: B004

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.