



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 16-02218**

**DATE:** 5/9/2002

Ken-Tool  
John Kusner  
PO Box 9320 768 E North St  
Akron, OH 443051197

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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

ARAQMD



---

**Permit To Install  
Terms and Conditions**

**Issue Date: 5/9/2002  
Effective Date: 5/9/2002**

---

**FINAL PERMIT TO INSTALL 16-02218**

Application Number: 16-02218  
APS Premise Number: 1677010304  
Permit Fee: **\$100**  
Name of Facility: Ken-Tool  
Person to Contact: John Kusner  
Address: PO Box 9320 768 E North St  
Akron, OH 443051197

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**768 E North St  
Akron, Ohio**

Description of proposed emissions unit(s):  
**Pyrolytic Burn-Off Oven, Replacement Equipment. Replaces PTI 16-01184.**

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

Ken-Tool

PTI Application: 16-02218

Issued: 5/9/2002

Facility ID: 1677010304

## 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 Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the 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 record keeping 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 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

**Ken-Tool****Facility ID: 1677010304****PTI Application: 16-02218****Issued: 5/9/2002**

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

**Ken-Tool****Facility ID: 1677010304****PTI Application: 16-02218****Issued: 5/9/2002**

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**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.

**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.

Ken-Tool

PTI Application: 16-02218

Issued: 5/9/2002

Facility ID: 1677010304

**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>
PE	0.10
CO	0.44
NO <sub>x</sub>	0.24
SO <sub>2</sub>	0.02
VOC	0.15

**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>
N002 - Ace 240 RKG pyrolytic burn-off oven - natural gas-fired, with 90,000 BTU/hour primary burner size, 425,000 BTU/hour secondary ( afterburner) burner size, 40 pounds per hour rated batch capacity, 10 pounds per hour maximum charging rate, to incinerate paint build-up on Type 6 waste parts (tire changing tools).	OAC rule 3745-31-05(A)(3)  OAC rule 3745-17-07(A)  OAC rule 3745-17-09(B)

**Ken-Tool**

**PTI Application: 16-02218**

**Issued**

**Facility ID: 1677010304**

**Emissions Unit ID: N002**

<u>Applicable Emissions Limitations/Control Measures</u>	per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged
0.023 pound of particulate emissions (PE) per hour	The incinerator, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.
0.10 ton of PE per year	
0.100 pound of carbon monoxide (CO) per hour	
0.44 ton of CO per year	
0.054 pound of nitrogen oxides (NO <sub>x</sub> ) per hour	
0.24 ton of NO <sub>x</sub> per year	
0.004 pound of sulfur dioxide (SO <sub>2</sub> ) per hour	
0.02 ton of SO <sub>2</sub> per year	
0.034 pound of volatile organic compounds (VOC) per hour	
0.15 ton of VOC per year	
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-09(B).	
Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average.	
0.20 pound of particulate emissions	

## **2. Additional Terms and Conditions**

- 2.a** The above hourly mass emission limitations (regulated under OAC rule 3745-31-05) for particulate matter, nitrogen oxides, sulfur oxides, carbon monoxide, and hydrocarbons are based upon the potential to emit of this emissions unit. Therefore, no record keeping, reporting, nor emissions calculations are required with these limitations.
- 2.b** The permittee shall properly adjust, operate, and maintain the emissions unit covered under this permit in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

## **B. Operational Restrictions**

1. This emissions unit shall only be fired with natural gas.
2. The permittee shall not process parts which may emit vapors of toxic metals such as lead or mercury.
3. The permittee shall not process parts or materials containing coatings or plastics which contain halogens such as chlorine, fluorine, or bromine.
4. This emissions unit shall be used to process organic compounds containing only carbon, hydrogen, and oxygen.
5. Batch incinerators (fully loaded while cold and never opened until the burn cycle is complete) shall incorporate a lockout system, which will prevent the ignition of waste until the exhaust gas temperature of the secondary combustion chamber reaches 1400 degrees Fahrenheit.
6. The secondary combustion chamber shall be maintained at a minimum exhaust gas temperature of 1400 degrees Fahrenheit until the wastes are completely combusted and the burn-down cycle is complete.

## **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain following information for this emissions unit:
  - a. The MSDS sheets for each material being removed from the salvageable material;
  - b. Documentation as to whether or not the material being removed contains any toxic metals;  
and

- c. Documentation as to whether or not the material being removed contains any halogens.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the secondary chamber of the incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. The permittee shall collect and record the following information for each day:
  - a. All 3-hour blocks of time during which the average combustion temperature within the secondary chamber of the incinerator, when the emissions unit was in operation, was less than 1400 degrees Fahrenheit; and
  - b. A log of the downtime for the control device and monitoring equipment, when the associated emissions unit was in operation.

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

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the processing of material in the incinerator that is prohibited in sections B.2 and B.3 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average temperature within the secondary chamber of the incinerator does not comply with the temperature limitation specified above.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2.b.

#### **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

0.023 pound of PE per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

Multiply 0.046 pound of particulate matter per million Btu of heat input [application data] by 0.5 million Btu of heat input per hour [maximum rated heat input].

b. Emission Limitation

0.10 ton of PE per year

Applicable Compliance Method

Multiply the allowable hourly particulate emission limitation by 8760 hours per year, and then divide by 2000.

c. Emission Limitation

0.20 pound of particulate emissions per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged

Applicable Compliance Method

Stack testing may be required in the future in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(8).

d. Emission Limitation

20% opacity as a six-minute average

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

e. Emission Limitation

0.100 pound of CO per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

Multiply 0.2 pound of carbon monoxide per million Btu of heat input [application data] by 0.5 million Btu of heat input per hour [maximum rated heat input].

f. Emission Limitation

0.44 ton of CO per year

Applicable Compliance Method

Multiply the allowable hourly emission rate for carbon monoxide by 8760 hours per year, and then divide by 2000.

g. Emission Limitation

0.054 pound of NO<sub>x</sub> per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

Multiply 0.108 pound of nitrogen oxides per million Btu of heat input [application data] by 0.5 million Btu of heat input per hour [maximum rated heat input].

h. Emission Limitation

0.24 ton of NO<sub>x</sub> per year

Applicable Compliance Method

Multiply the allowable hourly emission rate for nitrogen oxides by 8760 hours per year, and then divide by 2000.

i. Emission Limitation

0.004 pound of SO<sub>2</sub> per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

Multiply 0.008 pound of sulfur oxides per million Btu of heat input [application data] by 0.5 million Btu of heat input per hour [maximum rated heat input].

j. Emission Limitation

0.02 ton of SO<sub>2</sub> per year

Applicable Compliance Method

Multiply the allowable hourly emission rate for sulfur dioxide by 8760 hours per year, and then divide by 2000.

k. Emission Limitation

0.034 pound of VOC per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

Multiply 0.068 pound of hydrocarbons per million Btu of heat input [application data] by 0.5 million Btu of heat input per hour [maximum rated heat input].

l. Emission Limitation

0.15 ton of VOC per year

Applicable Compliance Method

Multiply the allowable hourly emission rate for volatile organic compounds by 8760 hours per year, and then divide by 2000.

14

**Ken-T**

**PTI A**

**Issued: 5/9/2002**

Emissions Unit ID: **N002**

**F. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 16-02218 Facility ID: 1677010304

FACILITY NAME Ken-Tool

FACILITY DESCRIPTION Pyrolytic Burn-Off Oven, Replacement Equipment. Replaces PTI 16-01184. CITY/TWP Akron

SIC CODE 3423 SCC CODE 5-02-001-01 EMISSIONS UNIT ID N002

EMISSIONS UNIT DESCRIPTION Ace 240 RKG pyrolytic burn-off oven (with afterburner) to incinerate paint build-up on parts (tire changing tools)

DATE INSTALLED April 2002

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter				0.023 pound per hour; and 0.20 pound per 100 pounds charged	0.10
PM <sub>10</sub>					
Sulfur Dioxide				0.004 pound per hour	0.02
Organic Compounds				0.034 pound per hour	0.15
Nitrogen Oxides				0.054 pound per hour	0.24
Carbon Monoxide				0.100 pound per hour	0.44
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? no NESHAP? no PSD? no OFFSET POLICY? no

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES x NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_