Ohio Environmental Protection Agency

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

9/15/2016

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Joe Green
JOHNSON CONTROL BATTERY GROUP INC.
10300 INDUSTRIAL RD
HOLLAND, OH 43528

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448002011
Permit Number: P0121428
Permit Type: Initial Installation
County: Lucas

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. 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**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO 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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Toledo Department of Environmental Services at (419)936-3015 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: TDES

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
JOHNSON CONTROL BATTERY GROUP INC.

Facility ID:	0448002011
Permit Number:	P0121428
Permit Type:	Initial Installation
Issued:	9/15/2016
Effective:	9/15/2016
Expiration:	3/20/2019

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
JOHNSON CONTROL BATTERY GROUP INC.

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Authorization

Facility ID:	0448002011
Application Number(s):	A0056573
Permit Number:	P0121428
Permit Description:	Initial Installation of AGM COS lines 12 and 15
Permit Type:	Initial Installation
Permit Fee:	$1,000.00
Issue Date:	9/15/2016
Effective Date:	9/15/2016
Expiration Date:	3/20/2019

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

JOHNSON CONTROL BATTERY GROUP INC.
10300 INDUSTRIAL ROAD
Holland, OH 43528

of a Permit-to-Install and Operate 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:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0121428
Permit Description: Initial Installation of AGM COS lines 12 and 15

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

Group Name: AGM COS lines 12 and 15

Emissions Unit ID:	**P114**
Company Equipment ID:	AGM Line 12
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P115**
Company Equipment ID:	AGM Line 15
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and KK: P114, P115. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Toledo Division of Environmental Services.

3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart PPPPPP, National Emission Standards for Hazardous Air Pollutants for Lead Acid Battery Manufacturing Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -AGM COS lines 12 and 15: P114, P115

EU ID	Operations, Property and/or Equipment Description
P114	COS line 12 absorbant glass mat (AGM) cast-on-strap (COS) line including a COS with a decoupled plate stacker, automatic post builder (APB), and heat seals (COS line and plate stacker controlled by 20,000 acfm baghouse exhausting to S/N 409; APB line 12 controlled by oil mist filter exhausting to S/N 310; Heat seal line 12 uncontrolled exhausting to S/N 410
P115	COS line 15 absorbant glass mat (AGM) cast-on-strap (COS) line including a COS with a decoupled plate stacker, automatic post builder (APB), and heat seals (COS line and plate stacker controlled by 20,000 acfm baghouse exhausting to S/N 411; APB line 15 controlled by oil mist filter exhausting to S/N 412; Heat seal line 15 uncontrolled exhausting to S/N 413

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)b.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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) June 30, 2008	Emissions of particulate matter 10 microns or less (PM10) shall not exceed 0.16 ton per month averaged over a 12-month rolling period from the stacks serving this emissions unit. Emissions of lead shall not exceed 0.0043 ton per month averaged over a twelve-month rolling period from the stacks serving this emissions unit. See b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 7.29 pounds per hour.
Plate stacker and cast-on strap (COS) operations controlled by a baghouse with secondary HEPA filtration (P114 - S/N 409, P115 – S/N 411)		
d.	OAC rule 3745-31-05(F)	Emissions of lead shall not exceed 0.000072 gr/dscf of exhaust from the plate stacker/COS stack.
e.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
f.	40 CFR Part 60, Subpart A (40 CFR 60.1 – 60.19)	See b)(2)d.
g.	40 CFR Part 60, Subpart KK (40 CFR 60.370 – 60.374) [In accordance with 40 CFR 60.370(b), this emissions unit is part of a three process operation facility used in the manufacture of lead acid storage batteries at a lead acid battery manufacturing plant that has a design capacity to produce in one day batteries containing an amount of lead equal to or greater than 6.5 tons and subject to the emissions limitations/control measures specified in this section.]	0.000437 gr/dscf of lead. [40 CFR 60.372(a)(2)] Visible particulate emissions shall not exceed 0% opacity as a 6-minute average from the stack serving this emissions unit. [40 CFR 60.372(a)(7)] See b)(2)e. and b)(2)f.
Automated post building (APB) operations controlled by an oil mist filter (P114 – S/N 310, shared control device with P113 – APB) (P115 – S/N 412, shared control device with P103 – APB)		
h.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
i.	40 CFR Part 60, Subpart A (40 CFR 60.1 – 60.19)	See b)(2)d.
j.	40 CFR Part 60, Subpart KK (40 CFR 60.370 – 60.374) [In accordance with 40 CFR 60.370(b), this emissions unit is a three process operation facility used in the manufacture of lead acid storage batteries at a lead acid battery manufacturing plant that has a design capacity of to produce in one day batteries containing an amount of lead equal to or greater than 6.5 tons and subject to the	0.000437 gr/dscf of lead. [40 CFR 60.372(a)(2)] Visible particulate emissions shall not exceed 0% opacity as a 6-minute average from the stack serving this emissions unit. [40 CFR 60.372(a)(7)] See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	emissions limitations/control measures specified in this section.]	
Heat seal operations with no controls (P114 - S/N 410, P115 – S/N 413)		
k.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions, from the stack serving this emissions unit, shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administration Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b(1)a., f)(1)e., and f)(1)f.

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 and lead emissions from this air contaminant source since the calculated annual emission rate for PM10 and lead is less than 10 tons/year, taking into account the filtration system required to comply with the federally enforceable rule limit of 0.000437 grain per dry standard cubic foot of exhaust under 40 CFR 60.372(a)(3). Since lead is a subset of particulate, and lead is required to be controlled under 40 CFR 60.370, particulate is also considered to be controlled by the rule.

c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart KK.

d. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.

e. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

f. The 0.000437 grain of lead per dry standard cubic foot of exhaust limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

c) Operational Restrictions

(1) The permittee shall operate the plate stacker and COS processes baghouse with secondary HEPA filtration system whenever this emissions unit is in operation.

(2) The permittee shall operate the APB process oil mist filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the COS Line 12 or COS Line 15 plate stacker/COS operations baghouse with secondary HEPA filtration system or the APB Line 12 or APB Line 15 process oil mist filtration system was not in service when the emissions unit was in operation.

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the COS plate stacker/COS operations secondary HEPA filter is between 0.25 to 3.5 inches of water column (WC) while the emissions unit is in operation except after replacement or complete cleaning of the filters, at which time a pressure drop of less than 0.25 inch WC shall be acceptable.

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the APB process oil mister filter is between 0.1 to 2.5 inches of water column (WC) while the emissions unit is in operation except after replacement or complete cleaning of the filters at which time a pressure drop of less than 0.1 inch WC shall be acceptable.

(4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the COS plate stacker secondary HEPA filter and APB process oil mist filter when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the COS plate stacker secondary HEPA filter and the APB oil mist filter on a weekly 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. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range 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 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 pressure drop 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.

(5) This range or limit on the pressure drop across the COS plate stacker with secondary HEPA filter and the oil mist filtration system is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) Pursuant to the 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

a. Construction date (no later than 30 days after such date);

b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

c. Actual start-up date (within 15 days after such date); and

d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency

DAPC - Permit Management Unit

P. O. Box 1049

Columbus, Ohio 43216-1049

and

Toledo Division of Environmental Services

Air Section

348 South Erie Street

Toledo, Ohio 43604

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the COS plate stacker baghouse with secondary HEPA filter and the APB process oil mist filtration system during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date) when the pressure drop across the COS plate stacker HEPA filter or the APB process oil mist filtration system 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 COS plate stacker baghouse with HEPA filter or the APB process oil mist filtration system;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

(4) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

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 Limitation:

0.000437 gr/dscf of lead from stack number S/N 310 and S/N 412.

0.000072 gr/dscf of lead from stack number S/N 409 and S/N 411.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Sections 60.8, 60.372 and 60.374 using methods and procedures specified in Method 12 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

Visible emissions of particulate shall not exceed 0% opacity as a 6-minute average from stack numbers S/N 409, S/N 310, S/N 411, & S/N 412 each.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with 40 CFR Part 60, Section 60.374 using methods and procedures specified in Method 9 of 40 CFR Part 60, Appendix A and Section 60.11.

c. Emission Limitation:

Visible emissions of particulate shall not exceed 20% opacity as a 6-minute average from stack numbers S/N 410 & S/N 413.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emission readings performed in accordance with Method 9 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC 3745-17-03(B)(1).

d. Emission Limitation:

Particulate emissions shall not exceed 7.29 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

PM10 emissions shall not exceed 0.16 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit utilizing a summation of these company-supplied emission factors for the operations in this emissions unit: 0.002 grains of PM_{10} per dry standard cubic foot) multiplied by an exhaust gas flow rate of 18,857 dscfm for S/N 409 & S/N 411, 0.01 grains of PM_{10} per dry standard cubic foot multiplied by an exhaust gas flow rate of 89 dscfm for S/N 310 & S/N 412, and 0.004 grains of PM10 per dry standard cubic foot multiplied by an exhaust gas flow rate of 3,100 dscfm for S/N 410 & S/N 413. The summation is then multiplied by 60 minutes per hour and multiplied by 8,760 hours per year and then divided by 7,000 grains per pound and divided by 2,000 pounds per ton. Then the result is divided by 12 months per year to calculate the average emissions per month.

If required, the permittee shall demonstrate compliance with this emissions limitation through emission testing for the emissions factors of 0.002 grains per dry standard cubic foot on S/N 409 & S/N 411, 0.01 grains per dry standard cubic foot on S/N 310 & S/N 412, and 0.004 grains per dry standard cubic foot on S/N 410 & S/N 413 performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

f. Emission Limitation:

Lead emissions shall not exceed 0.0043 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit utilizing a summation of these company-supplied emission factors and NSPS Subpart KK emissions factors for the operations in this emissions unit: 0.000072 grains of lead per dry standard cubic foot multiplied by an exhaust gas flow rate of 18,857 dscfm for S/N 409 & S/N 411 and 0.000437 grains of lead per dry standard cubic foot multiplied by an exhaust gas flow rate of 89 dscfm for S/N

310 & S/N 412. The summation is then multiplied by 60 minutes per hour and multiplied by 8,760 hours per year and then divided by 7,000 grains per pound and divided by 2,000 pounds per ton. Then the result is divided by 12 months per year to calculate the average emissions per month.

If required, the permittee shall demonstrate compliance with this emission limitation for the emissions factors of 0.000072 grains per dry standard cubic foot on S/N 409 & S/N 411 and 0.000437 grains per dry standard cubic foot on S/N 310 & S/N 412 in accordance with 40 CFR Part 60, Sections 60.8, 60.372 and 60.374 using methods and procedures specified in Method 12 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

(2) The permittee shall conduct, or have conducted, emission testing for emissions unit P114 (S/N 409 and S/N 310) and P115 (S/N 411 and S/N 412) in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup. Additional testing may be required consistent with Ohio EPA DAPC Engineering Guide #16 or by request of the Ohio EPA or Toledo Division of Environmental Services.

b. The emission testing shall be conducted on the plate stacker 12 and cast-on-strap 12 operations (S/N 409), the automated post building 12 operations (S/N 310), the plate stacker 15 and cast-on-strap 15 operations (S/N 411), and the automated post building 15 operations (S/N 412) to demonstrate compliance with the 0% opacity limit and the grains per dry standard cubic foot loading for lead emissions.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. For lead, Methods 1-4 and Method 12 of 40 CFR Part 60, Appendix A and the procedures in 40 CFR Parts 60.11 and 60.374. The sampling time and sample volume for each run shall be at least 60 minutes and 30 dscf.

ii. For opacity, Method 9 of 40 CFR Part 60, Appendix A and the procedures in 40 CFR Parts 60.11 and 60.374.

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

d. The permittee shall collect and record the static pressure drop across the control devices during testing.

e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the Toledo Division of Environmental Services 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.

h. 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 Toledo Division of Environmental Services 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 appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) None.