



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

10/19/2016

Certified Mail

Ms. Donna Howland  
PPG Industries - ERU  
559 Pittsburgh Rd  
Circleville, OH 43113

Facility ID: 0165010146  
Permit Number: P0083877  
County: Pickaway

RE: DRAFT AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Circleville Herald. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*  
Ohio EPA-CDO; Kentucky



## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Title V Permit Renewal

PPG Industries - ERU

559 Pittsburgh Road, , Circleville, OH 43113

ID#: P0083877

Date of Action: 10/19/2016

Permit Desc: Title V permit renewal for the PPG Energy Recovery Unit (ERU)/Hazardous Waste Incinerator.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Pamela McCoy, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778





**Statement of Basis**  
 PPG Industries - ERU  
 Permit Number: P0083877  
 Facility ID: 0165010146

## Statement of Basis for Air Pollution Title V Permit

Facility ID:	0165010146
Facility Name:	PPG Industries - ERU
Facility Description:	Hazardous Waste Incineration
Facility Address:	559 Pittsburgh Road, Circleville, OH 43113
Permit #:	P0083877, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input checked="" type="checkbox"/> Carbon Monoxide <input type="checkbox"/> Volatile Organic Compounds <input checked="" type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

### A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(V)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit	N/A



**Statement of Basis**  
 PPG Industries - ERU  
**Permit Number:** P0083877  
**Facility ID:** 0165010146

document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	<p>N002, PTI 01-549 issued June 1, 1983, and administratively modified October 23, 1985, March 18, 1988, and May 6, 1992. PTI 01-549 pre-dates the current permitting format which separates the terms and conditions into individual emissions unit specific terms and conditions. The PTI and extended TV permit include terms and conditions in the emissions unit specific section that are not associated with emissions unit N002. These terms and conditions have not been included in the TV renewal permit for emissions unit N002.</p> <p>The PTI and extended TV permit include terms and conditions assigned under the authority of 40 CFR Part 264, Subpart O which, with respect to rule applicability, has been replaced by requirements established pursuant to 40 CFR Part 63, Subpart EEE.</p> <p>The PTI and extended TV permit include PSD avoidance terms that apply to the waste heat recovery boiler associated with the ERU and other steam generating boilers located at the facility. These terms have been moved to the Facility-Wide section of the permit.</p> <p>With respect to federal rule applicability, the PTI cites 40 CFR Part 264, Subpart O, 40 CFR Part 61 Subparts C and E, and the extended TV permit cites 40 CFR Part 63, Subparts EEE and DD, and 40 CFR Part 61, Subparts C and E. 40 CFR Part 63, Subpart EEE and 40 CFR Part 61, Subparts C and E have been incorporated by reference (detailed-citation approach per Engineering Guide #70) in the emissions unit specific section of the permit while 40 CFR Part 63, Subpart DD has been incorporated by reference in the Facility-Wide section of the permit as the ERU is only practically regulated as a control device by this subpart and the facility has additional responsibilities under the subpart that do not affect the ERU. 40 CFR Part 61, Subpart FF has been incorporated by reference in the Facility-Wide section of the permit as the ERU is only practically regulated as a control device by this subpart and the facility has additional responsibilities under the subpart that do not affect the ERU. Additional federal rule citations have been included in the Facility-Wide section of the permit in order to clarify that additional federal rules may apply if certain conditions aren't maintained at the facility and to stipulate known negative declarations.</p> <p>The PTI and extended TV permit include terms and conditions associated with the Toxic Substances Control Act (TSCA). These terms have been removed because no state delegation has been granted for the provisions or enforcement of TSCA and there are no known state regulatory citations (Revised Code or Administrative Code) authorizing the inclusion of these terms.</p> <p>DAPC anticipates that the applicable PTI will need to be modified as a result of the Title V progression.</p>



Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N002 – Particulate emissions
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**B. Facility-Wide Terms and Conditions**

Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
B.2.	NA	NA	Identifies each insignificant emissions unit and states that the permittee is responsible for complying with all applicable state and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for each insignificant emissions unit
B.3.	3745-31-05(D)	NA	PSD avoidance terms included in the applicable PTI (01-549)
B.4.	NA	40 CFR Part 63, Subpart EEE	Applicability of 40 CFR Part 63, Subpart EEE, National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors
B.5.	NA	40 CFR Part 63, Subpart DD	Applicability of 40 CFR Part 63, Subpart DD, National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations
B.6.	NA	40 CFR Part 61, Subpart FF	Applicability of 40 CFR Part 61, Subpart FF, National Emission Standard for Benzene Waste Operations Recordkeeping necessary to avoid applicability of paragraphs 61.342(b) and (c) of 40 CFR Part 61, Subpart FF.
B.7.	NA	40 CFR Part 61, Subpart J	Recordkeeping necessary to avoid applicability of 40 CFR Part 61, Subpart J, National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene
B.8.	NA	40 CFR Part 61, Subpart V	Recordkeeping necessary to avoid applicability of 40 CFR Part 61, Subpart V, National Emission Standard for Equipment Leaks (Fugitive Emission Sources)
B.9.	NA	40 CFR Part 61,	Recordkeeping necessary to avoid applicability of 40 CFR Part 61, Subpart Y, National Emission Standard



Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
		Subpart Y	for Benzene Emissions from Benzene Storage Vessels
B.10.	3745-25	NA	Applicability of air pollution emergency emission control action programs
B.11	NA	40 CFR Part 64	Applicability of 40 CFR Part 64, Compliance Assurance Monitoring
B.12.	NA	40 CFR Part 60, Subpart Kb	Negative declaration
B.13.	NA	40 CFR Part 61, Subpart BB	Negative declaration
B.14.	NA	40 CFR Part 63, Subpart DDDDD	Negative declaration
B.15.	NA	40 CFR Part 63, Subpart JJJJJ	Negative declaration

**C. Emissions Unit Terms and Conditions**

Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements?	R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement Misc = miscellaneous requirements
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EU(s)	Limitation	Basis	ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
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		SIP (3745- )	Other										
N002	PE shall not exceed 0.05 gr/dscf corrected to 12% CO2.	3745-31-05(A) PTI 01-549	NA	N	N	N	N	N	N	N	N	N	Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009. A similar emissions limitation applies pursuant to 40 CFR Part 63, Subpart EEE.
N002	SO <sub>2</sub> emissions shall not exceed 0.126 lb/MMBtu of heat input to the ERU.	3745-31-05(A) PTI 01-549	NA	N	N	N	N	N	N	N	N	N	Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009.
N002	NO <sub>x</sub> emissions shall not exceed 0.315 lb/MMBtu of heat input to the ERU.	3745-31-05(A) PTI 01-549	NA	N	N	N	N	N	N	Y	N	N	Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009. Engineering guide #16 recommends subsequent testing for this pollutant every 2.5 years. The permit requires testing for this limitation to be performed concurrently with the Comprehensive and Confirmatory Performance Tests required by 40 CFR Part 63, Subpart EEE.
N002	CO emissions shall not exceed 0.245 lb/MMBtu of heat input to the ERU.	3745-31-05(A) PTI 01-549	NA	N	N	N	N	N	N	N	N	N	Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009. A similar emissions limitation applies pursuant to 40 CFR Part 63, Subpart EEE which also requires the use of continuous emissions monitoring system for this pollutant.
N002	Lead emissions shall not exceed 0.003 gr/dscf corrected to 12% CO2.	3745-31-05(A) PTI 01-549	NA	N	N	N	N	N	N	N	N	N	Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009. A similar emissions limitation applies pursuant to 40 CFR Part 63, Subpart EEE (Lead is regulated under Subpart EEE as a semivolatile metal).
N002	Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as	3745-17-07(A) PTI 01-549	NA	N	N	Y	N	Y	Y	N	N	N	Compliance with the visible emissions limitation is demonstrated through the use of a certified continuous opacity monitoring system.



**Statement of Basis**  
 PPG Industries - ERU  
 Permit Number: P0083877  
 Facility ID: 0165010146

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
	specified by rule.												
N002	Particulate emissions from the ERU shall not exceed 0.10 lb per 100 lb of liquid, semi-solid or solid refuse and salvageable material charged.	3745-17-09(B)	NA	N	N	N	N	N	N	N	N	N	Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009. A similar emissions limitation applies pursuant to 40 CFR Part 63, Subpart EEE.
N002	SO <sub>2</sub> emissions shall not exceed 30 P <sup>0.67</sup> pounds per hour, where P is the process weight rate in tons per hour.	3745-18-06(E)	NA	N	N	N	N	N	N	N	N	N	Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009. Although this limit was not previously assigned, the results of the December 22, 2009, test report indicates that the total maximum waste feed rate was 12,405 lbs/hr (6.21 T/hr) which would equate to a limit of 102 lb SO <sub>2</sub> /hr. The December 22, 2009, test report indicates an SO <sub>2</sub> average hourly emissions rate of 0.17 lb SO <sub>2</sub> /hr demonstrating compliance with the rule limitation.
N002	Beryllium emissions shall not exceed 10 grams over a 24-hour period.	NA	40 CFR Part 61, Subpart C	N	N	N	N	N	N	N	N	N	Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009. A similar emissions limitation applies pursuant to 40 CFR Part 63, Subpart EEE (Beryllium is regulated under Subpart EEE as a low volatile metal).
N002	Mercury emissions shall not exceed 3.2 kilograms (7.1 lb) per 24-hour period.	NA	40 CFR Part 61, Subpart E	N	N	N	N	N	N	N	N	N	Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009. A similar emissions limitation applies pursuant to 40 CFR Part 63, Subpart EEE.
N002	Dioxins and furans	NA	40 CFR Part 63,	N	Y	Y	N	Y	Y	Y	N	N	The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions,



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
	emissions in excess of 0.20 ng TEQ/dscm, corrected to 7 percent oxygen.		Subpart EEE										monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.
N002	Mercury in excess of 130 µg/dscm, corrected to 7 percent oxygen.	NA	40 CFR Part 63, Subpart EEE	N	Y	Y	N	Y	Y	Y	N	N	The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions, monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.
N002	Cadmium and lead in excess of 230 µg/dscm, combined emissions, corrected to 7 percent oxygen.	NA	40 CFR Part 63, Subpart EEE	N	Y	Y	N	Y	Y	Y	N	N	The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions, monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.
N002	Arsenic, beryllium, and chromium in excess of 92 µg/dscm, combined emissions, corrected to 7 percent oxygen.	NA	40 CFR Part 63, Subpart EEE	N	Y	Y	N	Y	Y	Y	N	N	The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions, monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.
N002	CO in excess of 100 ppmv, over an hourly rolling average (monitored continuously with a	NA	40 CFR Part 63, Subpart EEE	N	Y	Y	N	Y	Y	Y	N	N	The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions, monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.



**Statement of Basis**  
 PPG Industries - ERU  
 Permit Number: P0083877  
 Facility ID: 0165010146

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
	continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen.												
N002	Hydrocarbons in excess of 10 ppmv, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, and reported as propane.	NA	40 CFR Part 63, Subpart EEE	N	Y	Y	N	Y	Y	Y	N	N	The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions, monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.
N002	Hydrogen chloride and chlorine gas (total chlorine) in excess of 32 ppmv, combined emissions, expressed as a chloride (Cl(-)) equivalent, dry basis and corrected to 7	NA	40 CFR Part 63, Subpart EEE	N	Y	Y	N	Y	Y	Y	N	N	The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions, monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.



**Statement of Basis**  
 PPG Industries - ERU  
 Permit Number: P0083877  
 Facility ID: 0165010146

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
	percent oxygen.												
N002	PM in excess of 0.013 gr/dscf corrected to 7 percent oxygen.	NA	40 CFR Part 63, Subpart EEE	N	Y	Y	N	Y	Y	Y	N	N	The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions, monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.
N002	Feedstream Analysis Plan		40 CFR Part 63, Subpart EEE	N	N	Y	N	Y	N	N	N	N	<p>The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions, monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.</p> <p>PPG Industries operates the ERU for the purpose of incinerating wastes generated at PPG's manufacturing plants, including predominately clean-up solvents, waters, and off-specification products and raw materials from the manufacturing of paints and resins. In accordance with the effective Ohio Hazardous Waste Facility Installation and Operation Permit 01-65-0641 issued December 29, 2006, PPG Industries is permitted to accept for storage and treatment only wastes that have been generated by PPG Industries.</p> <p>The PPG-ERU Feedstream Analysis Plan categorizes the wastes received from PPG coating and resin facilities into 32 waste families. 20 independent waste families comprise the pumpable waste streams, while 12 independent waste families comprise the non-pumpable waste streams. In addition to waste profiles that are maintained and analyzed by both the PPG facility generating the waste and by the PPG-ERU, every pumpable and non-pumpable waste shipment received by PPG-ERU is sampled prior to storage and treatment. For each containerized shipment of pumpable waste, ten percent of pumpable liquid waste drums belonging to each of the 20 independent waste families are sampled to produce a composite sample. For each non-pumpable shipment, ten percent of non-pumpable liquid waste that contain solids or solids with free liquid are sampled to produce a composite sample.</p> <p>Waste profiles and samples taken for both pumpable and non-pumpable wastes received are analyzed to comply with the operating parameter limitations associated with the incinerators waste stream and the</p>



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
													applicable requirements established by 40 CFR Part 63, Subpart EEE. These parameters include total chlorine feed rate, ash feed rate, mercury feed rate, semi-volatile metal feed rate, and low-volatile metal feed rate.
N002	Comprehensive performance test		40 CFR Part 63, Subpart EEE	N	N	N	N	Y	Y	Y	N	N	<p>The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions, monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.</p> <p>In accordance with 40 CFR 63.1209(j)(4) which requires that PPG must specify operating parameters and limitations to ensure that good operation of each hazardous waste firing system is maintained, PPG has identified that the minimum lance atomization fluid pressure OPL has been established for this purpose.</p> <p>The most recent comprehensive performance test commenced on April 28, 2014. In accordance with 40 CFR Part 63.1207(d)(1), a subsequent comprehensive performance test is required to commence no later than 61 months after April 28, 2014.</p>
N002	Confirmatory performance test		40 CFR Part 63, Subpart EEE	N	N	N	N	Y	Y	Y	N	N	<p>The permit incorporates by reference (detailed-citation approach per Engineering Guide #70) all of the operational restrictions, monitoring/recordkeeping requirements, reporting requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart EEE.</p> <p>The most recent comprehensive performance test commenced on April 28, 2014. In accordance with 40 CFR Part 63.1207(d)(2), a confirmatory performance test is required to commence no later than 31 months after April 28, 2014.</p>
N002	PE shall not exceed 0.05 gr/dscf corrected to 12% CO2, and Particulate emissions from the ERU shall not exceed 0.10 lb per 100	NA	40 CFR Part 64 CAM	N	N	Y	N	Y	Y	N	N	N	Identifies that the monitoring requirements established pursuant to 40 CFR Part63, Subpart EEE for PE have been incorporated by reference to satisfy the CAM requirements for PE from EU N002. Establishes semi-annual reporting for deviations associated with the operation and activation of the AWFCO system as it relates to the OPLs established for PE.



**Statement of Basis**  
 PPG Industries - ERU  
**Permit Number:** P0083877  
**Facility ID:** 0165010146

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
	lb of liquid, semi-solid or solid refuse and salvageable material charged.												
N002	NA	NA	40 CFR Part 60, Subpart DDDD	Y	N	N	N	N	N	N	N	N	Negative declaration. The emissions unit is not subject to this subpart.
N002	NA	NA	40 CFR Part 60, Subpart MMMM	Y	N	N	N	N	N	N	N	N	Negative declaration. The emissions unit is not subject to this subpart.





**DRAFT**

**Division of Air Pollution Control  
Title V Permit  
for  
PPG Industries - ERU**

Facility ID:	0165010146
Permit Number:	P0083877
Permit Type:	Renewal
Issued:	10/19/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
PPG Industries - ERU

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**Draft Title V Permit**  
PPG Industries - ERU  
**Permit Number:** P0083877  
**Facility ID:** 0165010146

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

## Authorization

Facility ID: 0165010146  
Facility Description: Hazardous Waste Incineration  
Application Number(s): A0014315, A0051366  
Permit Number: P0083877  
Permit Description: Title V permit renewal for the PPG Energy Recovery Unit (ERU)/Hazardous Waste Incinerator  
Permit Type: Renewal  
Issue Date: 10/19/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0083876

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

PPG Industries - ERU  
559 Pittsburgh Road  
Circleville, OH 43113

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Central District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Title V Permit**  
PPG Industries - ERU  
**Permit Number:** P0083877  
**Facility ID:** 0165010146  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

**2. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Central District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Central District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Central District Office unless otherwise specified.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

#### **4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

#### **5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

#### **6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

#### **7. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.

- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## **8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## **9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Central District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
    - b. The permittee's current compliance status.

- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

#### **15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

## **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## **17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## **18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

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 Ohio EPA DAPC, Central District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) 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, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**25. Records Retention Requirements Under State Law Only**

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.

**26. 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 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.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

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 Ohio EPA DAPC, Central District Office 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).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



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**30. Submitting Documents Required by this Permit**

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Central District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



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## **B. Facility-Wide Terms and Conditions**



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

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description	
B012	475 HP Emergency Generator	PBR14992
F001	Plant Roadways and Parking Areas	PTI 01-549
F002	ERU Material Handling Operations	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
F003	Ash and Slag Loading Facility	PTI 01-549
J002	Bulk Liquid Unloading Facility	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
J003	Three Drum Pumpout Stations	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T002	15K Gallon Aqueous Process Tank #1501	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T003	15K Gallon Aqueous Process Tank #1502	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T004	15K Gallon Aqueous Process Tank #1503	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T005	15K Gallon Aqueous Process Tank #1504	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T006	15K Gallon Aqueous Process Tank #1505	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T007	15K Gallon Organic Process Tank #1506	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T008	15K Gallon Organic Process Tank #1515	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T009	15K Gallon Organic Process Tank #1516	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T010	15K Gallon Organic Process Tank #1517	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T011	15K Gallon Organic Process Tank #1518	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T012	15K Gallon Organic Process Tank #1519	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T013	15K Gallon Organic Process Tank #1520	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T014	15K Gallon Aqueous Process Tank #1511	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF



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EU ID	Operations, Property and/or Equipment Description	
T015	15K Gallon Aqueous Process Tank #1512	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T016	15K Gallon Aqueous Process Tank #1513	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T017	15K Gallon Aqueous Process Tank #1514	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T018	2,100 Gallon Control Solvent Feed Tank #1521	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T019	2,100 Gallon Control Solvent Feed Tank #1522	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T020	1,700 Gallon Drum Pumpout Tank #1523	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T021	1,700 Gallon Drum Pumpout Tank #1524	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T022	1,700 Gallon Drum Pumpout Tank #1525	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T023	4,800 Gallon Overflow Tank #1526	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T024	4,800 Gallon Overflow Tank #1527	PTI 01-549; 40 CFR Part 63, Subpart DD; 40 CFR Part 61, Subpart FF
T026	8,000 Gallon Caustic Soda Tank #1538	PTI 01-549
T027	2,600 Gallon Decantation Vessel #1540	PTI 01-549

3. PSD allows net annual emissions increase from a modification as shown in column 1 of Table 1 below. Based on 365 days, the daily emissions are shown in column 2. Emissions reductions will occur contemporaneously because of the shutdown of existing equipment. Column 4 is the sum of columns 2 and 3, and represents the increment available for operation of the Energy Recovery Unit because of the credits available from reductions.

Table 1  
Permitted Emissions from the Energy Recovery Unit

<u>Column 1</u>	<u>Column 2</u>		<u>Column 3</u>	<u>Column 4</u>
Pollutant	PSD Review Criteria		Offset Credit	Applicable Increment
	(ton/yr)	(lb/day)	(lb/day)	(lb/day)
CO	100	547.95	83.29	631.24
NO <sub>x</sub>	40	219.18	276.44	495.62
SO <sub>x</sub>	40	219.18	10.71	229.89



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TSP	25	136.99	22.3	159.29
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Total daily emissions from the ERU can be defined by four sets of equations using two variables. The variables are daily steam output from the heat recovery boiler and steam output from fuel-fired boilers. The constants are calculated from emission factors. Two cases apply, depending on the choice of fuel in the boilers.

**Case 1 – Natural Gas**

Where X = heat recovery boiler output

Y = fuel-fired boiler output

Carbon Monoxide = 0.325 (X thousand lb) + 0.02062 (Y thousand lb)

Nitrogen Oxides = 0.458 (X thousand lb) + 0.1456 (Y thousand lb)

Sulfur Oxides = 0.172 (X thousand lb) + 0.00728 (Y thousand lb)

Particulates = 0.155 (X thousand lb) + 0.01213 (Y thousand lb)

**Case 2 – Fuel Oil**

Where X = heat recovery boiler output

Y = fuel-fired boiler output

Carbon Monoxide = 0.325 (X thousand lb) + 0.04 (Y thousand lb)

Nitrogen Oxides = 0.458 (X thousand lb) + 0.176 (Y thousand lb)

Sulfur Oxides = 0.172 (X thousand lb) + 1.152 x S% (Y thousand lb)

Particulates = 0.155 (X thousand lb) + 0.016 (Y thousand lb)

The maximum allowable values (under PSD regulations) of the resultant of these equations are those given in the fourth column of Table 1. The maximum values of X and Y are set by the steam generating capacity of the boilers:

Maximum X = 1,008 thousand lb/day (42 thousand lb/hr)

Maximum Y = 1,305.6 thousand lb/day (54.4 thousand lb/hr)

PPG shall operate the ERU, peaking boilers, and stand-by boilers in such a manner so that the amount of emissions in column 4 of Table 1 is not exceeded.

When burning natural gas, the limiting factor occurs when the incinerator is operating at 71% capacity or greater. The peaking and stand-by boilers are then not allowed to operate at capacity.



For Case 2, SO<sub>2</sub> is the limiting factor and steam generation depends on the sulfur content of the oil. At the allowable limit of 0.5% sulfur in the oil, the maximum possible steam generation at the facility is 1106 thousand pounds per day. This would occur with the incinerator operating at full load. As incinerator usage drops, the maximum allowable steam generation would drop. With the incinerator down, the maximum possible steam generation from the boilers would be 399 thousand pounds per day when using 0.5% sulfur oil.

PPG shall install operation controls so the Case 1 and Case 2 equations are never exceeded. Also PPG shall install monitoring devices that would allow Ohio EPA personnel to determine compliance with the Case 1 and Case 2 equations during an inspection.

The permittee shall submit quarterly reports that identify each day during which an available daily increment (column 4) for CO, NO<sub>x</sub>, SO<sub>x</sub>, or TSP was exceeded.

[Authority for term: PTI 01-549, OAC rule 3745-31-05(D), and OAC rule 3745-77-07(A)(1)]

4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart EEE: N002. The complete MACT requirements, including the MACT 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 Ohio EPA, Central District Office.

[Authority for term: 40 CFR Part 63, Subpart EEE]

5. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart DD: F002, J002, J003, N002, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T014, T015, T016, T017, T018, T019, T020, T021, T022, T023, and T024. The complete MACT requirements, including the MACT 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 Ohio EPA, Central District Office.

The permittee shall comply with the applicable standards, operational restrictions, monitoring and recordkeeping requirements, reporting and notification requirements, and testing requirements established pursuant to 40 CFR Part 63, Subpart DD, including, but not limited to the following relevant sections:

Applicable Rule	Requirement
40 CFR 63.684	Off-Site Material Treatment
40 CFR 63.685	Standards: Tanks
40 CFR 63.688	Standards: Containers
40 CFR 63.689	Standards: Transfer Systems
40 CFR 63.690	Standards: Process Vents
40 CFR 63.691	Standards: Equipment Leaks
40 CFR 63.693	Standards: Closed-Vent Systems and Control Devices



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Applicable Rule	Requirement
40 CFR 63.694	Testing Methods and Procedures
40 CFR 63.695	Inspection and Monitoring Requirements
40 CFR 63.696	Recordkeeping Requirements
40 CFR 63.697	Reporting Requirements

6. The following emissions units contained in this permit are subject to 40 CFR Part 61, Subpart FF: F002, J002, J003, N002, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T014, T015, T016, T017, T018, T019, T020, T021, T022, T023, and T024. The complete MACT requirements, including the MACT 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 Ohio EPA, Central District Office.

The permittee shall comply with the applicable standards, operational restrictions, monitoring and recordkeeping requirements, reporting and notification requirements, and testing requirements established pursuant to 40 CFR Part 61, Subpart FF, including, but not limited to the following relevant sections:

40 CFR 61.342	Standards: General
40 CFR 61.343	Standards: Tanks
40 CFR 61.345	Standards: Containers
40 CFR 61.346	Standards: Individual Drain Systems
40 CFR 61.348	Standards: Treatment Processes
40 CFR 61.349	Standards: Closed-Vent Systems and Control Devices
40 CFR 61.354	Monitoring of Operations
40 CFR 61.355	Test Methods, Procedures, and Compliance Provisions
40 CFR 61.356	Recordkeeping Requirements
40 CFR 61.357	Reporting Requirements

For the purpose of avoiding applicability of 61.342(b) and (c), the permittee shall monitor and maintain the total annual benzene (TAB) quantity received on-site is less than 10 megagrams per year (Mg/yr) (11 tons/year), and that the permittee does not receive waste from any facility listed in 61.340(a) whose TAB exceeds 10 Mg/yr as determined in accordance with 61.342(a) and the procedures identified in 61.355.

7. For the purpose of avoiding applicability of 40 CFR Part 61, Subpart J, the permittee shall maintain the records necessary to demonstrate that none of the pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, and control devices or systems are intended to operate in benzene service as defined in 61.111 and determined in accordance with 61.245(d).
8. For the purpose of avoiding applicability of 40 CFR Part 61, Subpart V, the permittee shall maintain the records necessary to demonstrate that none of the pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, and control devices or systems are intended to operate in volatile hazardous air pollutant (VHAP) service as defined in 61.241 and determined in accordance with 61.245(d).
9. For the purpose of avoiding applicability of 40 CFR Part 61, Subpart Y, the permittee shall maintain the records necessary to demonstrate that each storage vessel is not storing benzene having a specific gravity within the ranges specified in 61.270(a) or that each storage vessel meets the conditions specified in 61.270(c), 61.270(d), or 61.270(e).
10. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25- 03, shall be developed and submitted within 60 days after receiving notification from Ohio EPA.
11. Ohio EPA, Central District Office has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units N002. The permittee shall comply with the provisions of the plan (as specified in Part C – Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions unit.

#### Negative Declarations

12. 40 CFR Part 60, Subpart Kb – This subpart is not applicable because the facility (0165010146) does not include any storage vessels with a capacity greater than or equal to 75 cubic meters (19,815 gallons).
13. 40 CFR Part 61, Subpart BB – This subpart is not applicable because the facility (0165010146) does not include any loading racks at which benzene is loaded into tank trucks, railcars, or marine vessels.
14. 40 CFR Part 63, Subpart DDDDD – The waste heat recovery boiler located at this facility (0165010146) is not subject to the provisions of this subpart because waste heat boilers are specifically excluded from the definition of “boiler” in 63.7575.
15. 40 CFR Part 63, Subpart JJJJJJ – The waste heat recovery boiler located at this facility (0165010146) is not subject to the provisions of this subpart because waste heat boilers are specifically excluded from the definition of “boiler” in 63.11237.



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## **C. Emissions Unit Terms and Conditions**

**1. N002, ERU Incinerator**

**Operations, Property and/or Equipment Description:**

Energy Recovery Unit (ERU) incinerator system used to burn PPG wastes and recover energy.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) Best Available Technology  (PTI 01-549)	Particulate emissions (PE) shall not exceed 0.05 grains per dry standard cubic foot (gr/dscf) corrected to 12% carbon dioxide (CO <sub>2</sub> ). Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.126 pounds per million British thermal units (lb/MMBtu) of heat input to the ERU.  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 0.315 pounds per million British thermal units (lb/MMBtu) of heat input to the ERU.  Carbon monoxide (CO) emissions shall not exceed 0.245 pounds per million British thermal units (lb/MMBtu) of heat input to the ERU.  Lead emissions shall not exceed 0.003 gr/dscf corrected to 12% CO <sub>2</sub> .  The permittee shall not charge any asbestos-containing waste into the ERU.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), 3745-17-09(B), 3745-17-09(C), and 3745-18-06.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.  See b)(2)a. below.
c.	OAC rule 3745-17-09(B)	Particulate emissions from the ERU shall not exceed 0.10 lb per 100 lb of liquid, semi-solid or solid refuse and salvageable material charged.
d.	OAC rule 3745-17-09(C)	The ERU, including all associated equipment and grounds, shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.
e.	OAC rule 3745-18-06(E)	See b)(2)b. below.
f.	OAC rule 3745-21-07(M)(4)	The requirements established by this rule are less stringent than the requirements established pursuant to 40 CFR Part 63, Subpart EEE.
g.	OAC rule 3745-31-05(D)  Federally Enforceable Restrictions to avoid PSD	See B.3. above and c)(1) below.
h.	40 CFR Part 63, Subpart EEE	The ERU shall not discharge or cause combustion gases to be emitted into the atmosphere that contain:  Dioxins and furans emissions in excess of 0.20 nanograms (toxicity equivalents) per dry standard cubic meter (ng TEQ/dscm), corrected to 7 percent oxygen;  Mercury in excess of 130 micrograms per dry standard cubic meter (µg/dscm), corrected to 7 percent oxygen;  Cadmium and lead in excess of 230 µg/dscm, combined emissions, corrected to 7 percent oxygen;  Arsenic, beryllium, and chromium in excess of 92 µg/dscm, combined emissions, corrected to 7 percent oxygen;

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>CO in excess of 100 parts per million by volume (ppmv), over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen;</p> <p>Hydrocarbons in excess of 10 ppmv, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, and reported as propane;</p> <p>Hydrogen chloride and chlorine gas (total chlorine) in excess of 32 ppmv, combined emissions, expressed as a chloride (Cl<sup>-</sup>) equivalent, dry basis and corrected to 7 percent oxygen; and</p> <p>Particulate matter (PM) in excess of 0.013 gr/dscf corrected to 7 percent oxygen.</p> <p>The ERU shall achieve a destruction and removal efficiency (DRE) of 99.99% for each principle organic hazardous constituent (POHC).</p> <p>The ERU is not permitted to burn and shall not burn dioxin-listed hazardous wastes, including waste codes of F020, F021, F022, F023, F026 or F027.</p>
i.	40 CFR Part 63, Subpart DD	See B.5. above.
j.	40 CFR Part 63, Subpart A	See b)(2)c. and b)(2)d. below.
k.	40 CFR Part 61, Subpart C	Beryllium emissions shall not exceed 10 grams over a 24-hour period.
l.	40 CFR Part 61, Subpart E	Mercury emissions shall not exceed 3.2 kilograms (7.1 lb) per 24-hour period.
m.	40 CFR Part 61, Subpart FF	See B.6. above.
n.	40 CFR Part 61, Subpart A	See b)(2)e. below.
o.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(9) and e)(3) below.
<i>Negative Declarations and Exemptions</i>		
p.	40 CFR Part 60, Subpart DDDD	See b)(2)f. below.
q.	40 CFR Part 60, Subpart MMMM	See b)(2)g. below.

(2) Additional Terms and Conditions

- a. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

The continuous opacity monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

- b. Sulfur dioxide emissions shall not exceed the amount indicated by the following equation:

$$\text{AER} = 30 P^{0.67}$$

Where P is the process weight rate in tons per hour and AER is the allowable emission rate in pounds of SO<sub>2</sub> per hour.

- c. Table 1 to Subpart EEE of 40 CFR Part 63 - "General Provisions Applicable to Subpart EEE" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.
- d. Table 2 to Subpart DD of 40 CFR Part 63 - "Applicability of Paragraphs in Subpart A of This Part 63—General Provisions to Subpart DD" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.
- e. The permittee shall comply with the applicable provisions identified in 40 CFR Part 61, Subpart C and Subpart E in accordance with the applicable provisions identified in 40 CFR Part 61, Subpart A.

*Negative Declarations and Exemptions*

- f. Exempt pursuant to 60.2555(g), Subpart DDDD exempts hazardous waste combustion units which are required to obtain a permit under section 3005 of the Solid Waste Disposal Act.
- g. Exempt pursuant to 60.5065, Subpart MMMM exempts combustion units that incinerate sewage sludge and are not located at a wastewater treatment facility designed to treat domestic sewage sludge.

c) Operational Restrictions

- (1) When burning fuel oil, steam generation from the waste heat recovery boiler associated with the ERU shall not exceed 1,106 thousand lb/day.

[Authority for term: PTI 01-549, OAC rule 3745-31-05(D), and OAC rule 3745-77-07(A)(1)]

- (2) Start-up of the ERU shall begin with the heating of the cold combustion zone with natural gas, distillate fuel oil, or waste materials which have been classified as hazardous solely due to their ignitibility. Alternate fuels may not be used unless the Director of the Ohio EPA has granted prior approval. Feeding of waste materials to the ERU shall not commence until each applicable Operating Parameter Limitation (OPL) determined in accordance with 40 CFR Part 63, Subpart EEE has been satisfied.

During the start-up period, the NO<sub>x</sub> emissions limitation established pursuant to OAC rule 3745-31-05(A)(3) (0.315 lb NO<sub>x</sub>/MMBtu) shall not apply.

[Authority for term: PTI 01-549 and OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall comply with the applicable operational restrictions established pursuant to 40 CFR part 63, Subpart EEE, including, but not limited to the following relevant sections:

Applicable Rule	Requirement
63.1206(b)	Compliance with standards.
63.1206(c)	Operating requirements.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subparts EEE and A]

d) Monitoring and/or Recordkeeping Requirements

- (1) Records of materials received for disposal at the facility shall be maintained by PPG. The records shall contain at a minimum:
- a. the name of the PPG plant from which the material was received;
  - b. the address and location of the facility from which the material was received;
  - c. the date the material was received;
  - d. an identification of the vehicle(s) transporting the material including the PUCO or other legal identification number and license plate number;
  - e. the amount of material and type of container; and
  - f. a description of the material including chemical composition.

[Authority for term: PTI 01-549 and OAC rule 3745-77-07(C)(1)]

- (2) PPG shall maintain records of the materials burned in the ERU. The records shall contain at a minimum:
- a. The total hourly average mass feed rate to the ERU;
  - b. The average hourly total heat input to the ERU;
  - c. The average hourly ash content of the material fed to the ERU;
  - d. The average hourly chlorine content of the material fed to the ERU; and
  - e. The average hourly sulfur content of the material fed to the ERU.

[Authority for term: PTI 01-549 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall operate and maintain the continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from this emissions unit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

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

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
- d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
- f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

[Authority for term: PTI 01-549 and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (Ohio EPA, Central District Office) upon request.

[Authority for term: PTI 01-549 and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable monitoring requirements established pursuant to 40 CFR part 63, Subpart EEE, including, but not limited to the following relevant sections:

Applicable Rule	Requirement
63.1209(a)	Continuous emissions monitoring (CEM) and continuous opacity monitoring (COM) system requirements.
63.1209(b)	Continuous monitoring systems (CMS) requirements for operating parameter limits (OPL).
63.1209(c)	Analysis of feedstreams.
63.1209(d)	Performance evaluations.
63.1209(e)	Conduct of monitoring.
63.1209(f)	Operation and maintenance of CMS
63.1209(g)	Alternative monitoring requirements other than CEMS.
63.1209(h)	Reduction of monitoring data.
63.1209(i)	When an OPL is applicable to multiple standards.
63.1209(j)	Establishing OPLs to demonstrate compliance with the DRE standard.
63.1209(k)	Establishing OPLs to demonstrate compliance with the dioxin and furans emission standard.
63.1209(l)	Establishing OPLs to demonstrate compliance with the mercury emission standard.
63.1209(m)	Establishing OPLs to demonstrate compliance with the particulate matter emission standard.
63.1209(n)	Establishing OPLs to demonstrate compliance with the semivolatile metals and low volatility metals emission standards.
63.1209(o)	Establishing OPLs to demonstrate compliance with the hydrogen chloride and chlorine gas emission standard.
63.1209(p)	Maximum combustion chamber pressure.
63.1209(q)	Operating under different modes of operation.



Applicable Rule	Requirement
63.1209(r)	Averaging periods.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subparts EEE and A]

- (6) Pursuant to 40 CFR Part 63.1209(c)(2), the permittee is required to develop and implement a Feedstream Analysis Plan (FAP). The permittee shall analyze all waste(s) in accordance with the FAP dated June 2006, and revised March 2011, prior to incineration. Substantive changes to the FAP shall be submitted to Ohio EPA, Central District Office for approval prior to implementation of the changes. Any waste(s) that cannot be analyzed in accordance with the FAP shall not be incinerated.
- (7) The permittee shall comply with the applicable recordkeeping requirements established pursuant to 40 CFR part 63, Subpart EEE, including, but not limited to the following relevant sections:

Applicable Rule	Requirement
63.1200	Information required to document and maintain compliance with the regulations of Subpart EEE, including data recorded by continuous monitoring systems (CMS), and copies of all notifications, reports, plans, and other documents submitted to the Administrator.
63.1206(b)(1)(ii)	If affected sources elect to comply with all applicable requirements and standards promulgated under authority of the Clean Air Act, including Sections 112 and 129, in lieu of the requirements of Subpart EEE when not burning hazardous waste, affected sources must document in the operating record that they are in compliance with those requirements.
63.1206(b)(5)(ii)	Documentation that a change will not adversely affect compliance with the emission standards or operating requirements.
63.1206(b)(11)	Calculation of hazardous waste residence time.
63.1206(c)(2)	Startup, shutdown, and malfunction plan.
63.1206(c)(2)(v)(A)	Documentation of an affected source's investigation and evaluation of excessive exceedances during malfunctions.
63.1206(c)(3)(v)	Corrective measures for any automatic waste feed cutoff that result in an exceedance of an emission standard or operating parameter limit.
63.1206(c)(3)(vii)	Documentation and results of the automatic waste feed cutoff operability testing.
63.1206(c)(4)(ii)	Emergency safety vent operating plan.
63.1206(c)(4)(iii)	Corrective measures for any emergency safety vent opening.
63.1206(c)(5)(ii)	Method used for control of combustion system leaks.
63.1206(c)(6)	Operator training and certification program.
63.1206(c)(7)(i)(D)	Operation and maintenance plan.

Applicable Rule	Requirement
63.1209(c)(2)	Feedstream analysis plan.
63.1209(k)(6)(iii), 63.1209(k)(7)(ii), 63.1209(k)(9)(ii), 63.1209(o)(4)(iii)	Documentation that a substitute activated carbon, dioxin/furan formation reaction inhibitor, or dry scrubber sorbent will provide the same level of control as the original material.
63.1209(k)(7)(i)(C)	Results of carbon bed performance monitoring.
63.1209(q)	Documentation of changes in modes of operation.
63.1211(c)	Documentation of compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subparts EEE and A]

- (8) The permittee is required to comply with the operating requirements of 40 CFR 63 Subpart EEE, including requirements to conduct comprehensive performance tests, as applicable, to conduct confirmatory performance tests, as applicable, to establish Operating Parameter Limits (OPL), as applicable, and to develop and update a Notification of Compliance (NOC), as applicable.

The following table identifies the operating parameter limitations (OPL), the averaging period, and the applicable standard to which the OPL is intended to demonstrate continuous compliance as identified in the most recent Notification of Compliance (NOC), (June 24, 2014):

OPERATING PARAMETER	LIMIT	AVG. PERIOD <sup>1</sup>	APPLICABLE STANDARDS
Minimum primary combustion chamber temperature	1773°F	HRA	HC, DRE, D/F
Minimum secondary combustion chamber temperature	1188°F	HRA	HC, DRE, D/F
Maximum flue gas flow rate	18,266 scfm	HRA	HC, DRE, D/F, PM, SVM, LVM, HCl/Cl <sub>2</sub>
Maximum total hazardous waste feed rate	12,472 lb/hr	HRA	HC, DRE, D/F
Maximum total pumpable hazardous waste feed rate	10,621 lb/hr	HRA	HC, DRE, D/F
Minimum lance atomization fluid pressure	20 psig	HRA	HC, DRE
Maximum mercury feed rate	0.12 lb/hr	12-hr RA	Mercury
Maximum ash feed rate	513 lb/hr	12-hr RA	PM
Maximum semivolatiles metals feed rate	74 lb/hr	12-hr RA	SVM
Maximum low volatile metals feed rate	42 lb/hr	12-hr RA	LVM
Maximum chlorine feed	85 lb/hr	12-hr RA	SVM, LVM, HCl/Cl <sub>2</sub>

OPERATING PARAMETER	LIMIT	AVG. PERIOD <sup>1</sup>	APPLICABLE STANDARDS
rate			
Maximum combustion chamber pressure	0.0 in. w.c.	Instantaneous <sup>3</sup>	Fugitive emissions
Maximum electrostatic precipitator inlet temperature	527°F	HRA	D/F, SVM, LVM
Electrostatic precipitator operation	All three fields in operation <sup>2</sup>	---	PM, SVM, LVM
Minimum electrostatic precipitator total secondary current	789 mA	HRA	PM, SVM, LVM
Maximum quench outlet temperature	185°F	HRA	Mercury, HCl/Cl <sub>2</sub>
Minimum packed bed scrubber pressure drop	0.15 in. w.c.	HRA	Mercury, HCl/Cl <sub>2</sub>
Minimum packed bed scrubber liquid feed pressure	18 psig	HRA	Mercury, HCl/Cl <sub>2</sub>
Minimum packed bed scrubber liquid pH	7.1	HRA	HCl/Cl <sub>2</sub>
Minimum packed bed scrubber liquid to gas ratio	22 gal/Mcf	HRA	Mercury, HCl/Cl <sub>2</sub>
Carbon bed operations	All three vessels in operation	---	D/F, mercury
Carbon bed life	Manufacturer's specifications	---	D/F, mercury
Carbon specifications: Minimum sieve analysis	95 percent for 3.35 mm mesh	---	D/F, mercury
Carbon specifications: Minimum butane activity	23% wt	---	D/F, mercury
Carbon specifications: Minimum carbon tetrachloride activity	60% wt	---	D/F, mercury
Maximum carbon bed inlet temperature	165°F	HRA	D/F, mercury
Minimum Shell dioxin destruction system inlet temperature	353°F	HRA	D/F
Maximum Shell dioxin destruction system catalyst time in-use	Manufacturer's specifications	---	D/F
Maximum Shell dioxin destruction system inlet temperature	550°F	HRA	D/F

1. HRA refers to hourly rolling average. 12-hr RA refers to 12-hour rolling average.
2. If any one field of the ESP is out of operation for more than one hour, hazardous waste feed will be cutoff.
3. PPG has established this limit with a five-second delay.

The permittee shall operate and maintain all of the equipment necessary to monitor the applicable OPLs in accordance with the requirements identified in 60.1209(f). In accordance with 63.1210(d), the OPLs identified in the table above are effective until such time that a subsequent comprehensive and confirmatory performance test is performed and a subsequent NOC has been prepared and postmarked.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subparts EEE and A]

- (9) The CAM plan for monitoring the particulate emissions (PE) from this emissions unit has been developed to incorporate the requirements which are also necessary to demonstrate compliance with the PE limitation established pursuant to 40 CFR Part 63, Subparts EEE. This plan incorporates by reference the OPLs associated with the PE limitation established pursuant to 40 CFR Part 63, Subpart EEE and establishes performance indicators related to the maximum flue gas flow rate, ash feed rate, the operation of the electrostatic precipitator (ESP) fields, and the minimum ESP total secondary current. The requirements established pursuant to 40 CFR Part 63, Subpart EEE including 63.1209(m) which relates to establishing appropriate OPLs, and 63.1206(c)(3) which relates to the automatic waste feed cutoff system (AWFCO), are also incorporated by reference. The incorporation of these relevant requirements, established pursuant to 40 CFR Part 63, Subpart EEE, is determined to satisfy the enhanced monitoring requirements established pursuant to 40 CFR Part 64. The emissions unit and control equipment shall be operated in accordance with the approved CAM plan, or any approved revision of the plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64, CAM]

e) Reporting Requirements

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

Quarterly Reporting Requirements

- (1) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.

- b. These quarterly reports shall include the following:
- i. the facility name and address;
  - ii. the manufacturer and model number of the continuous opacity monitor;
  - iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;
  - iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
  - v. the total operating time (hours) of the emissions unit;
  - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
  - vii. the date, time, and duration of any/each malfunction\*\* of the continuous opacity monitoring system, emissions unit, and/or control equipment;
  - viii. the date, time, and duration of any downtime\*\* of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
  - ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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

\* Where no exceedance of the opacity limit has occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the quarterly EER report.

\*\* Each downtime and malfunction event shall be reported regardless of whether there is an exceedance of the opacity limit.

[Authority for term: PTI 01-549 and OAC rule 3745-77-07(C)(1)]

40 CFR Part 63 Reporting Requirements

- (2) The permittee shall comply with the applicable reporting and notification requirements established pursuant to 40 CFR part 63, Subpart EEE, including, but not limited to the following relevant sections:

Applicable Rule	Requirement
63.1206(b)(5)(i)	Notification of changes in design, operation, or maintenance.
63.1206(c)(8)(iv)	Notification of excessive bag leak detection system exceedances.
63.1206(c)(9)(v)	Notification of excessive particulate matter detection system exceedances.
63.1207(e)	Notification of performance test and continuous monitoring system evaluation, including the performance test plan and CMS performance evaluation plan. <sup>1</sup>
63.1210(b)	Notification of intent to comply.
63.1212(a)	Certification of intent to comply.
63.1210(d), 63.1207(j), 63.1207(k), 63.1207(l)	Notification of compliance, including results of performance tests and continuous monitoring system performance evaluations.
63.1206(b)(4), 63.1213	Affected sources may request an extension of the compliance date for up to one year.
63.1206(b)(5)(i)(C)	Affected sources may request to burn hazardous waste for more than 720 hours and for purposes other than testing or pretesting after making a change in the design or operation that could affect compliance with emission standards and prior to submitting a revised Notification of Compliance.
63.1206(b)(8)(iii)(B)	If affected sources elect to conduct particulate matter CEMS correlation testing and wish to have federal particulate matter and opacity standards and associated operating limits waived during the testing, affected sources must notify the Administrator by submitting the correlation test plan for review and approval.
63.1206(b)(8)(v)	Affected sources may request approval to have the particulate matter and opacity standards and associated operating limits and conditions waived for more than 96 hours for a correlation test.
63.1206(b)(14)	Owners and operators of incinerators may elect to comply with an alternative to the particulate matter standard.
63.1206(c)(2)(ii)(B)	Affected sources must submit the startup, shutdown, and malfunction plan to the Administrator for review and approval.
63.1206(c)(2)(ii)(B)	Startup, shutdown, and malfunction plan.
63.1206(c)(3)(vi)	Excessive exceedances reports.
63.1206(c)(4)(iv)	Emergency safety vent opening reports.
63.1206(c)(5)(i)(C)	Affected sources may request an alternative means of control to provide control of combustion system leaks.
63.1206(c)(5)(i)(D)	Affected sources may request other techniques to prevent fugitive emissions without use of instantaneous pressure limits.
63.1207(c)(2)	Affected sources may request to base initial compliance on data in lieu of a comprehensive performance test.
63.1207(d)(3)	Affected sources may request more than 60 days to complete a performance test if additional time is needed for reasons beyond the affected source's control.
63.1207(e)(3)	Affected sources may request a time extension if the

Applicable Rule	Requirement
	Administrator fails to approve or deny an affected source's test plan.
63.1207(h)(2)	Affected sources may request to waive current operating parameter limits during pretesting for more than 720 hours.
63.1207(f)(1)(ii)(D)	Affected sources may request a reduced hazardous waste feedstream analysis for organic hazardous air pollutants if the reduced analysis continues to be representative of organic hazardous air pollutants in an affected source's hazardous waste feedstreams.
63.1207(g)(2)(v)	Affected sources may request to operate under a wider operating range for a parameter during confirmatory performance testing.
63.1207(i)	Affected sources may request up to a one-year time extension for conducting a performance test (other than the initial comprehensive performance test) to consolidate testing with other state or federally-required testing.
63.1207(j)(4)	Affected sources may request more than 90 days to submit a Notification of Compliance after completing a performance test if additional time is needed for reasons beyond an affected source's control.
63.1207(l)(3)	After failure of a performance test, affected sources may request to burn hazardous waste for more than 720 hours and for purposes other than testing or pretesting.
63.1209(a)(5)	Affected sources may request: (1) Approval of alternative monitoring methods for compliance with standards that are monitored with a CEMS; and (2) approval to use a CEMS in lieu of operating parameter limits.
63.1209(g)(1)	Affected sources may request approval of: (1) Alternatives to operating parameter monitoring requirements, except for standards that affected sources must monitor with a continuous emission monitoring system (CEMS) and except for requests to use a CEMS in lieu of operating parameter limits; or (2) a waiver of an operating parameter limit.
63.1209(l)(1)	Affected sources may request to extrapolate mercury feedrate limits.
63.1209(n)(2)	Affected sources may request to extrapolate semivolatile and low volatile metal feedrate limits.
63.1211(d)	Affected sources may request to use data compression techniques to record data on a less frequent basis than required by §63.1209.

<sup>1</sup>Affected sources may also be required on a case-by-case basis to submit a feedstream analysis plan under §63.1209(c)(3).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subparts EEE and A]

40 CFR Part 64 (CAM) Reporting Requirements

- (3) The CAM plan for monitoring the particulate emissions (PE) from this emissions unit has been developed to incorporate the requirements which are also necessary to demonstrate compliance with the PE limitation established pursuant to 40 CFR Part 63, Subparts EEE. The requirements established pursuant to 40 CFR Part 63, Subpart EEE including 63.1206(c)(3)(vi) which relates to reporting OPL exceedances and the activation of the AWFCO system are also incorporated by reference.

The permittee shall submit semi-annual deviation (excursion) reports that identify the following:

- a. each exceedance of an OPL established pursuant to 63.1209(m), while hazardous waste remains in the combustion chamber, during which the AWFCO system was not activated; and
- b. each operability test performed in accordance with 63.1206(c)(3)(vii) for an OPL established pursuant to 63.1209(m), during which the AWFCO system failed to activate.

The semi-annual deviation (excursion) reports shall be submitted by July 31 and January 31 of each year and shall cover the previous semi-annual period. If no deviations occurred during a semi-annual period, the permittee shall submit a semi-annual report which states that no deviations occurred during that semi-annual period.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64, CAM]

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:

BAT Emissions Limitations

a. Emissions Limitation:

PE shall not exceed 0.05 gr/dscf corrected to 12% CO<sub>2</sub>.

Applicable Compliance Method:

Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009.

If required, compliance with the particulate emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emissions Limitation:

SO<sub>2</sub> emissions shall not exceed 0.126 lb/MMBtu of heat input to the ERU.



Applicable Compliance Method:

Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009.

If required, compliance with the SO<sub>2</sub> emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

c. Emissions Limitation:

NO<sub>x</sub> emissions shall not exceed 0.315 lb/MMBtu of heat input to the ERU.

Applicable Compliance Method:

Compliance shall be determined in accordance with f)(3).

d. Emissions Limitation:

CO emissions shall not exceed 0.245 lb/MMBtu of heat input to the ERU.

Applicable Compliance Method:

Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009.

If required, compliance with the CO emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

e. Emissions Limitation:

Lead emissions shall not exceed 0.003 gr/dscf corrected to 12% CO<sub>2</sub>.

Applicable Compliance Method:

Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009.

If required, compliance with the lead emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 12 or Method 29.

[Authority for term: PTI 01-549, OAC rule 3745-77-07(A)(1), and OAC rule 3745-77-07(C)(1)]

OAC Rule Emissions Limitations

f. Emission Limitation:



Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the opacity limitation contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and/or Recordkeeping Requirements section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

[Authority for term: PTI 01-549, OAC rule 3745-17-07, OAC rule 3745-77-07(A)(1), and OAC rule 3745-77-07(C)(1)]

g. Emission Limitation:

Particulate emissions from the ERU shall not exceed 0.10 lb per 100 lb of liquid, semi-solid or solid refuse and salvageable material charged.

Applicable Compliance Method:

Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009.

If required, compliance with the particulate emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: PTI 01-549, OAC rule 3745-17-09(B), OAC rule 3745-77-07(A)(1), and OAC rule 3745-77-07(C)(1)]

h. Emissions Limitation:

SO<sub>2</sub> emissions shall not exceed 30 P<sup>0.67</sup> pounds per hour, where P is the process weight rate in tons per hour.

Applicable Compliance Method:

If required, compliance with the hourly SO<sub>2</sub> emissions limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

[Authority for term: OAC rule 3745-18-06(E), OAC rule 3745-77-07(A)(1), and OAC rule 3745-77-07(C)(1)]

40 CFR Part 61 Emissions Limitations

i. Emissions Limitation:

Beryllium emissions shall not exceed 10 grams over a 24-hour period.

Applicable Compliance Method:

Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009.

If required, compliance with the beryllium emissions limitation shall be demonstrated in accordance with 61.33.

Emissions Limitation:

Mercury emissions shall not exceed 3.2 kilograms (7.1 lb) per 24-hour period.

Applicable Compliance Method:

Compliance with this emissions limitation was demonstrated through emissions tests performed in August and October 2009 and documented in the emissions test report submitted on December 22, 2009.

If required, compliance with the mercury emissions limitation shall be demonstrated in accordance with 61.53 or 61.54.

[Authority for term: PTI 01-549, OAC rule 3745-77-07(A)(1), OAC rule 3745-77-07(C)(1), and 40 CFR Part 61, Subparts C and E]

40 CFR Part 63 Emissions Limitations

j. Emissions Limitations:

The ERU shall achieve a destruction and removal efficiency (DRE) of 99.99% for each principle organic hazardous constituent (POHC).

The ERU shall not discharge or cause combustion gases to be emitted into the atmosphere that contain:

- i. Dioxins and furans emissions in excess of 0.20 ng TEQ/dscm, corrected to 7 percent oxygen;
- ii. Mercury in excess of 130 µg/dscm, corrected to 7 percent oxygen;
- iii. Cadmium and lead in excess of 230 µg/dscm, combined emissions, corrected to 7 percent oxygen;
- iv. Arsenic, beryllium, and chromium in excess of 92 µg/dscm, combined emissions, corrected to 7 percent oxygen;
- v. CO in excess of 100 ppmv, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen;



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

- vi. Hydrocarbons in excess of 10 ppmv, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, and reported as propane;
- vii. Hydrogen chloride and chlorine gas (total chlorine) in excess of 32 ppmv, combined emissions, expressed as a chloride (Cl(-)) equivalent, dry basis and corrected to 7 percent oxygen; and
- viii. PM in excess of 0.013 gr/dscf corrected to 7 percent oxygen.

Applicable Compliance Method:

Compliance shall be determined in accordance with f)(3).

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-77-07(C)(1), and 40 CFR Part 63, Subpart EEE]

- (2) The permittee shall comply with the applicable testing requirements established pursuant to 40 CFR part 63, Subpart EEE, including, but not limited to the following relevant sections:

Applicable Rule	Requirement
63.1207(a)	General performance testing requirements.
63.1207(b)	Types of performance tests.
63.1207(d)	Frequency of testing.
63.1207(e)	Notification of performance test and CMS performance evaluation, and approval of test plan and CMS performance evaluation plan.
63.1207(f)	Content of performance test plan.
63.1207(g)	Operating conditions during testing.
63.1207(h)	Operating conditions during subsequent testing.
63.1207(i)	Time extension for subsequent performance tests.
63.1207(j)	Notification of compliance.
63.1207(k)	Failure to submit a timely notification of compliance.
63.1207(l)	Failure of performance test.
63.1207(m)	Waiver of performance test.
63.1208(b)	Test methods.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-77-07(C)(1), and 40 CFR Part 63, Subpart EEE]

(3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. For 40 CFR Part 63, Subpart EEE requirements, the emission testing shall be conducted in accordance with 63.1207(d)(1) for comprehensive performance testing (a comprehensive performance test shall commence no later than 61 months after the date of commencing the previous comprehensive performance test) and in accordance with 63.1207(d)(2) for confirmatory performance testing (a confirmatory performance test shall commence no later than 31 months after the date of commencing the previous comprehensive performance test).

The most recent comprehensive performance test commenced on April 28, 2014.

b. For BAT requirements, testing to demonstrate compliance with the lb/MMBtu NO<sub>x</sub> emissions limitation shall be conducted each time that a comprehensive performance test is required.

c. The emission testing shall be conducted to demonstrate compliance with:

i. The requirements established pursuant to 40 CFR Part 63, Subpart EEE; and

ii. The lb/MMBtu NO<sub>x</sub> emissions limitation established as BAT for this emissions unit.

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

i. The methods identified in 63.1208(b) for pollutants regulated by 40 CFR Part 63, Subpart EEE; and

ii. Methods 1 through 4 and 7E for NO<sub>x</sub> emissions. The method(s) for evaluating the Btu value of the waste incinerated shall be submitted and approved to Ohio EPA, Central District Office prior to conducting the required emission testing.

e. In accordance with 63.1207(g), the permittee is required to conduct the performance testing required by 40 CFR Part 63, Subpart EEE under operating conditions that are representative of the extreme range of normal conditions and consistent with 63.7(e)(1). Performance testing to demonstrate compliance with the lb/MMBtu NO<sub>x</sub> emissions limitation shall also be conducted under these conditions.

f. For the purpose of demonstrating compliance with 40 CFR Part 63, Subpart EEE, the permittee is required to submit testing notifications in accordance with 63.1207(e). The timelines identified in 63.1207(e) shall also be used to notify Ohio EPA, Central District Office of the permittee's intent to demonstrate



compliance with the lb/MMBtu NO<sub>x</sub> emissions limitation. Therefore, for the purpose of demonstrating compliance with the lb/MMBtu NO<sub>x</sub> emissions limitation, an "Intent to Test" notification shall be included with the appropriate notifications required by 63.1207(e) and 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), the person(s) who will be conducting the test(s), and the proposed method(s) for determining the Btu value of the waste incinerated during the performance tests.

- g. Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. In accordance with 63.1207(j) and 63.1210(d), the permittee is required to postmark a Notification of Compliance and the associated performance test results within 90 days following completion of a relevant compliance demonstration. The results of the performance tests conducted to demonstrate compliance with the lb/MMBtu NO<sub>x</sub> emissions limitation shall also be included in such notifications.

g) **Miscellaneous Requirements**

- (1) None.