

Additional Special Terms and Conditions

**(Requirements For Source P001)**

**A. Operational Restrictions**

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 5 inches of water at all times while the emissions unit is in operation.

**B. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on once per shift basis.
- b. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

**C. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the static pressure drop across the scrubber was not maintained at or above the required level.

2. The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by

the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **D. Testing Requirements**

1. Compliance with the emission limitation(s) in Permit to Install 16-1822 shall be determined in accordance with the following method(s):

##### **a. Emission Limitation:**

0.016 lb/hr sulfuric acid  
0.07 TPY sulfuric acid

##### **Applicable Compliance Method:**

If required, compliance with this mass emission limitation shall be based in stack testing per Method 8 of 40 CFR Part 60, Appendix A.

##### **b. Emission Limitation:**

0.0008 lb/hr formaldehyde  
0.003 TPY formaldehyde

##### **Applicable Compliance Method:**

If required, compliance with this mass emission limitation shall be based in stack testing per Method 0011 of 40 CFR Part 266, Appendix A.

**(Requirements For Sources P002 & P003)**

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1. This permit allows the use of the materials specified by the permittee in the application for PTI number 16-1822. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the ammonia emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

**Pollutant: Ammonia (P002)**

**TLV (mg/m<sup>3</sup>): 17**  
**Maximum Hourly Emission Rate (lbs/hr): 0.5**  
**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m<sup>3</sup>): 121.4**  
**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 404**

**Pollutant: Ammonia (P003)**

**TLV (mg/m<sup>3</sup>): 17**  
**Maximum Hourly Emission Rate (lbs/hr): 1.53**  
**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m<sup>3</sup>): 386.6**  
**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 404**

2. As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

- a. any changes in the composition of the materials, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

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- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change in the compositions of the materials, or use of new materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6); and
- d. Any change in the composition of the materials, or use of materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.