State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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www.epa.state.oh.us

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Certified Mail

5/13/2009

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

DAVID SCHEUB
RADTECH
692 US ROUTE 224
NOVA, OH 44895

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0303010170
Permit Number: P0104356
Permit Type: Initial Installation
County: Ashland

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate
for
RADTECH

Facility ID:	0303010170
Permit Number:	P0104356
Permit Type:	Initial Installation
Issued:	5/13/2009
Effective:	5/13/2009
Expiration:	5/13/2019

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
RADTECH

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Authorization

Facility ID: 0303010170
Application Number(s): A0036725
Permit Number: P0104356
Permit Description: The purpose of this permit is for the initial installation of a L&L Bake Oven, (1) 50" Electric Induction Bake Furnace and (2) 96" Electric Induction Bake Furnaces.
Permit Type: Initial Installation
Permit Fee: $1,600.00
Issue Date: 5/13/2009
Effective Date: 5/13/2009
Expiration Date: 5/13/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

RADTECH
692 US ROUTE 224
Nova, OH 44859

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0104356
Permit Description: The purpose of this permit is for the initial installation of a L&L Bake Oven, (1) 50" Electric Induction Bake Furnace and (2) 96" Electric Induction Bake Furnaces.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	**B001**
Company Equipment ID:	L&L Bake Oven
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	50" Electric Induction Furnace (RADG108)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: 96" Electric Induction Furnaces

Emissions Unit ID:	**P009**
Company Equipment ID:	96" Electric Induction Furnace (G2)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	96" Electric Induction Furnace (G3)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

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

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

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. B001, L&L Bake Oven

Operations, Property and/or Equipment Description:

L&L Bake Oven - 3.9 mmBtu/hr natural gas fired oven controlled by an afterburner.

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

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

a. g)(1).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)(a)	1.12 lbs organic compounds (OC)/hour & 0.49 tons OC/year See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) control requirements for this emissions unit have been determined to be the use of a secondary combustion chamber. BAT requirements also include compliance with the terms and conditions of this permit.

The emissions of nitrogen oxides, sulfur dioxide, carbon monoxide and particulate matter are solely the products of combustion from natural gas. Since these emissions are negligible, they will not be addressed for this emissions unit.

b. The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-

17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

c. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c) Operational Restrictions

(1) The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:

a. the secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1400 degrees Fahrenheit, taking into account normal start-up procedures; and

b. the secondary chamber shall allow for a minimum retention time of 0.5 seconds at 1400 degrees Fahrenheit, taking into account normal start-up procedures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall install, operate, and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Emission Limitation</u>

1.12 lbs OC/hour

<u>Applicable Compliance Method</u>

The hourly OC emission limitation was determined as follows:

by multiplying the maximum process throughput of 1200 lbs Ballard Material Product (BMP)/batch, by an emission factor of 0.22 lbs OC/lbs BMP [based on empirical weight loss], dividing by a conservative emission release time of 12 hours/one batch and applying a 95% control efficiency from the secondary combustion chamber (1.1), plus

dividing the maximum emission rate of 5.5 lbs OC/10^6 scf of natural gas (AP-42, Section 1.4, Table 1.4-1, 7/98) by a heat content of 1020 Btu/scf, and multiplying by a maximum heat input of 3.9 mmBtu/hr (0.02).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

b. Emission Limitation

0.49 tons OC/year

Applicable Compliance Method

The annual OC emission limitation was determined as follows:

by multiplying the hourly emission limitation calculated from the process material (1.1) by a conservative emission release time of 12 hrs/batch, by a maximum number of 61 batches/yr and then dividing by 2,000 pounds/ton (0.40), plus

the maximum hourly emission limitation calculated from combustion multiplied by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton (0.09).

Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual emission limitation will be assumed.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute@, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. P008, 50" Electric Induction Furnace (RADG108)

Operations, Property and/or Equipment Description:

50" Electric Induction Furnace - 8,000 lbs/batch maximum.

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

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

a. g)(1).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)(a)(ii)	See b)(2)a.
b.	OAC rule 3745-18-06(E)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	OAC rule 3745-17-07(B)	See b)(2)e.
f.	OAC rule 3745-17-08(B)	See b)(2)f.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3)(a) do not apply to the uncontrolled carbon monoxide, sulfur dioxide, nitrogen dioxide, organic compounds and particulate matter less than 10 microns emissions from this air contaminant source since the potential to emit for each of these pollutants is less than 10 tons/year.

b. This emissions unit is exempt from the emission limitations for sulfur dioxide (SO_2) specified in OAC rule 3745-18-06(E) pursuant to OAC rule 3745-18-06(C), because the process equipment has a rated capacity equal to, or less than, one thousand pounds per hour process weight input.

c. The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

d. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

e. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

f. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the ATOXIC Air Contaminant Statute@, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

3. Emissions Unit Group - 96" Electric Induction Furnaces: P009, P010

EU ID	Operations, Property and/or Equipment Description
P009	96" Electric Induction Furnace - 6,000 lbs/batch maximum and controlled by a thermal oxidizer.
P010	96" Electric Induction Furnace - 6,000 lbs/batch maximum and controlled by a thermal oxidizer.

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

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

a. g)(1).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)(a)(ii)	See b)(2)a. and b)(2)b.
b.	OAC rule 3745-18-06(E)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)d.
d.	OAC rule 3745-17-07(A)	See b)(2)e.
e.	OAC rule 3745-17-07(B)	See b)(2)f.
f.	OAC rule 3745-17-08(B)	See b)(2)g.

(2) Additional Terms and Conditions

a. Permit to Install P0104356 for each air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for purposes of avoiding BAT requirements under OAC rule 3745-31-05(A)(3)(a) for organic compounds:

i. use of a thermal oxidizer control system capable of achieving 50% capture and 90% control efficiency.

The capture efficiency is established at 50% to avoid capture efficiency compliance testing while still remaining below BAT thresholds.

b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3)(a) do not apply to the uncontrolled emissions of carbon monoxide, sulfur dioxide, nitrogen dioxide and particulate matter less than 10 microns from each air contaminant source since the potential to emit for each of these pollutants is less than 10 tons/year.

c. Each emissions unit is exempt from the emission limitations for sulfur dioxide (SO_2) specified in OAC rule 3745-18-06(E)(2) pursuant to OAC rule 3745-18-06(C), because the process equipment has a rated capacity equal to, or less than, one thousand pounds per hour process weight input.

d. The uncontrolled mass rate of PE from each emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

e. Each emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

f. Each emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

g. Each emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the combustion temperature on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer=s specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. These records shall be maintained at the facility for a period of no less than 3 years.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. each incident of deviation described in e)(1)a. or e)(1)b. (above) where a prompt investigation was not conducted;

d. each incident of deviation described in e)(1)a. or e)(1)b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in e)(1)a. or e)(1)b. where proper records were not maintained for the investigation and/or the corrective action(s).

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute@, ORC 3704.03(F)(4)(b), was not necessary because each emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.