



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
FRANKLIN COUNTY**

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 01-08855

DATE: 5/13/2004

NuCore Automotive
Stanley Greenblott
2100 Refugee Rd
Columbus, OH 43207

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$500** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission

FRANKLIN COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **01-08855** FOR AN AIR CONTAMINANT SOURCE FOR
NUCORE AUTOMOTIVE

On 5/13/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **NuCore Automotive**, located at **2100 Refugee Rd, Columbus**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08855:

Max 4000 sweat furnace.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



**Permit To Install
Terms and
Conditions**

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

DRAFT PERMIT TO INSTALL 01-08855

Application Number: 01-08855
APS Premise Number: 0125042360
Permit Fee: **To be entered upon final issuance**
Name of Facility: NuCore Automotive
Person to Contact: Stanley Greenblott
Address: 2100 Refugee Rd
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2100 Refugee Rd
Columbus, Ohio**

Description of proposed emissions unit(s):
Max 4000 sweat furnace.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

NuCore Automotive

Facility ID: 0125042360

PTI Application: 01-08855

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- 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, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. 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 are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

4. 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.

5. 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.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. 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.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. 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.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

Issued: To be entered upon final issuance

applicable requirement in this 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:
 - i. 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.
 - ii. 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 ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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 appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

NuCore Automotive

Facility ID: 0125042360

PTI Application: 01-08855

Issued: To be entered upon final issuance

3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

NuCore Automotive

Facility ID: 0125042360

PTI Application: 01-08855

Issued: To be entered upon final issuance

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally

NuCore Automotive

Facility ID: 0125042360

PTI Application: 01-08855

Issued: To be entered upon final issuance

Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM10	0.97
SO2	15.3
NOx	2.63
OC	0.21
CO	1.75

12

NuCore Automotive

PTI Application: 01-08855

Issued: To be entered upon final issuance

Facility ID: 0125042360

NuCore Automotive
PTI Application: 01 00055
Issued

Facility ID: 0125042360

Emissions Unit ID: P002

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

NuCo

PTI A

Emissions Unit ID: P002

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P002 - 2000 lbs/hr Natural Gas-Fired Max 4000 Sweat Furnace with secondary afterburner	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(A)(2)
		40 CFR 63.1505 (f) Subpart RRR

NuCo₁

PTI A

Emissions Unit ID: P002

Issued: To be entered upon final issuance

Applicable Emissions Limitations/Control Measures	limitation established pursuant to OAC rule 3745-31-05(A)(3).
Particulate emissions (PE) as PM10 shall not exceed 0.22 lb/hr and 0.97 ton/yr.	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
Nitrogen oxide (NOx) emissions shall not exceed 0.6 lb/hr and 2.63 tons/yr. See section A.I.2.a below.	Dioxin/Furan emissions shall not exceed 0.8 nanogram TEQ per dry standard cubic meter at 11% oxygen. See sections A.I.2.b, A.II.1, A.III.1 and A.IV.1, below.
Sulfur oxide (SOx) emissions shall not exceed 3.5 lbs/hr and 15.3 tons/yr. See section A.I.2.a below.	
Carbon monoxide (CO) emissions shall not exceed 0.4 lb/hr and 1.75 tons/yr. See section A.I.2.a below.	
Organic compound (OC) emissions shall not exceed 0.05 lb/hr and 0.21 ton/yr. See section A.I.2.b below.	
Stack opacity shall not exceed 5% opacity as a 3-minute average.	
The requirements of this rule also include compliance with the requirements of 40 CFR 63.1505 (f) Subpart RRR	
The emission limitation specified by this rule is less stringent than the emission	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The 0.6 lb NO_x/hr, 3.5 lbs SO_x/hr, and 0.4 lb CO/hr emission limitations for this emissions unit were established to reflect the maximum hourly potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- 2.b** The permittee shall comply with 40 CFR 63 Subpart RRR under paragraph 63.1505(f)(1), as an area source, by operating and maintaining an afterburner with a design residence time of 0.8 second or greater and an operating temperature of 1600 degrees Fahrenheit or greater.
- 2.c** The permittee shall operate this emissions unit and associated afterburner in accordance with the requirements for a sweat furnace operating as an area source. The permittee shall prepare and implement an Operation, Maintenance and Monitoring (OM&M) Plan as required in 40 CFR 63.1510(b). The owner or operator must comply with all of the provisions of the OM&M plan as submitted to and approved by the Ohio EPA Central District Office (CDO) or Central Office, unless and until the plan is revised and the revisions are approved by the same office. If the Ohio EPA determines at any time, following the receipt of the OM&M plan, that any revisions to the plan are necessary to satisfy the requirements of this section or Subpart RRR, the owner or operator must promptly make all necessary revisions and resubmit the revised plan. If the owner or operator determines that any other revision(s) or modification(s) to the OM&M plan is/are necessary, such revision(s) shall not become effective until submitted and approved by the Ohio EPA. The OM&M plan must contain the following information:
- i. the process and control device parameters to be monitored to determine compliance, along with the established operating levels/limits or ranges, as applicable, for the furnace and afterburner;
 - ii. a monitoring schedule for the sweat furnace and its afterburner;
 - iii. procedures for the proper operation and maintenance of the sweat furnace and afterburner used to meet the emission limit from 40 CFR 63.1505, i.e., dioxin/furan emissions not to exceed 0.8 nanogram TEQ per dry standard cubic meter at 11% oxygen;
 - iv. procedures for proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
 - (a) calibration and certification of accuracy of each monitoring device, at least

Emissions Unit ID: P002

once every 6 months, according to the manufacturer's instructions; and

- (b) procedures for the quality control and quality assurance of continuous emission monitoring systems as required by the general provisions in 40 CFR 63 Subpart A;
 - v. procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners; and if required, the procedure(s) that would be used for determining charge/feed rate (or throughput) if a process weight rate is required;
 - vi. corrective actions to be taken when process/operating parameters or afterburner control parameters deviate from the established value/limit or range, including:
 - (a) procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and
 - (b) procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed; and
 - vi. a maintenance schedule for the afterburner that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
3. Startup, shutdown, and malfunction plan. The permittee shall develop and implement a written plan as described in 40 CFR Part 63 Subpart RRR Section 63.6(e)(3), that contains specific procedures to be followed for operating and maintaining the emissions unit during periods of startup, shutdown, and malfunction; and a program of corrective action for any malfunction of the sweat furnace or afterburner and/or deviation from process weight rate and/or afterburner restrictions, used to demonstrate compliance with the standard.

II. Operational Restrictions

1. The average combustion temperature within the secondary afterburner, for any 3-hour block of time, when the emissions unit is in operation, shall not be less than 1600 degrees Fahrenheit; and the afterburner shall have a design residence time of 0.8 second or greater.
2. The permittee shall not charge more than 2000 pounds of feed or scrap per hour to the furnace. Since 2000 pounds is the design capacity of the sweat furnace, records of the process weight rate shall not be required unless requested or required by the Ohio EPA.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the secondary afterburner when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitoring device must meet each of the following performance and equipment specifications.
 - a. the temperature monitoring device must be installed at the exit of the combustion zone of each afterburner;
 - b. the monitoring system must record the temperature in 15-minute block averages and determine and record the average temperature for each 3-hour block of time;
 - c. the recorder response range must include zero and 1.5 multiplied by the average temperature of 1600 degrees Fahrenheit; and
 - d. the reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.
2. The permittee must conduct an inspection of each afterburner at least once per year. The results of all inspections and repairs must be recorded. At a minimum, an inspection shall include:
 - a. inspection of all burners, pilot assemblies, and pilot sensing devices for proper operation and clean pilot sensor;
 - b. inspection for proper adjustment of combustion air;
 - c. inspection of internal structures (e.g. baffles) to ensure structural integrity;
 - d. inspection of dampers, fans, and blowers for proper operation;
 - e. inspection for proper sealing;
 - f. inspection of motors for proper operation;
 - g. inspection of combustion chamber refractory lining and clean and replace lining as necessary;
 - h. inspection of afterburner shell for corrosion and /or hot spots;
 - i. documentation, for the burn cycle that follows the inspection, that the afterburner is operating properly and any necessary adjustments have been made; and

Issued: To be entered upon final issuance

- j. verification that the equipment is maintained in good operating condition.

Following an equipment inspection, all necessary repairs shall be completed in accordance with the requirements of the OM&M plan. All changes in the OM&M plan shall be approved in writing by the Ohio EPA prior to implementation.

3. The permittee shall collect and record the following information for each day:
 - a. all 3-hour blocks of time during which the average combustion temperature within the secondary afterburner, when the emissions unit was in operation, was less than 1600 degrees Fahrenheit;
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
 - c. for any excursion from the temperature or recording requirements in "a" and/or downtime recorded in "b", a brief explanation of the cause of the excursion and/or downtime and the corrective action taken.
4. The permittee shall also keep records of each event as required by 40 CFR Part 63 Subpart RRR Section 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR Part 63 Subpart RRR Section 63.6(e)(3). In addition to the information required in 40 CFR Part 63 Subpart RRR Section 63.6(e)(3), the plan must include:
 - a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
 - b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
5. The owner or operator must retain each record, referenced below, for at least five years following the date of occurrence, measurement, maintenance, corrective action(s), report or record. The most recent 2 years of records must be retained at the facility and the remaining 3 years of records may be retained off-site. The owner or operator may retain records on microfilm, computer discs, magnetic tape, or microfiche. The following information must be included in these records:
 - a. each 15-minute block average afterburner operating temperature, including any period when the average temperature in any 3-hour block period falls below the compliant operating parameter value with a brief explanation of the cause of the excursion and the

corrective action taken; and

- b. the results of annual afterburner inspections.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time when the average temperature falls below the compliant afterburner operating temperature with a brief explanation of the cause of the excursion and the corrective action taken. The quarterly deviation reports shall be submitted as required in the General Terms and Conditions contained in this permit.
2. Notification of compliance status report. The permittee shall submit a notification of compliance status report within 60 days following startup. The notification must be signed by a responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified below; and the permittee shall provide the same notification of compliance to the Administrator (Region V). A complete notification of compliance status report shall include:
 - a. the manufacturer's specification or analysis documenting the design residence time of no less than 0.8 seconds and design operating temperature of no less than 1600 degrees F for each afterburner used to control emissions from a sweat furnace that is not subject to a performance test;
 - b. the approved OM&M Plan; and
 - c. the Startup, Shutdown, and Malfunction Plan (which may be included as part of the OM&M Plan).
3. Excess emissions/summary report and startup/shutdown/malfunction reports. As required by 40 CFR Part 63 Subpart RRR and Section 63.10, the permittee shall submit semiannual excess emissions reports and startup/shutdown/malfunction reports following the end of each 6-month reporting period. Each report must also contain the information specified in 40 CFR Part 63 Subpart RRR Section 63.10(c) for the continuous temperature monitor. When no deviation(s) from the afterburner operating parameters, process weight rate restriction, and/or no malfunction(s) have occurred, the permittee shall submit a report stating that no excess emissions, deviations from operational parameters, or malfunction(s) have occurred during the reporting period. The report shall include any of the following conditions occurring during any 6-month reporting period:
 - a. a deviation from the compliant process/operating parameter values of the afterburner, i.e., the 0.8-second residence time and/or minimum operating temperature of 1600 degrees F;
 - b. any action taken during a startup, shutdown, or malfunction that was not consistent with the procedures in the plan as described in 40 CFR Part 63 Subpart RRR Section 63.6(e)(3); and

Issued: To be entered upon final issuance

- c. any period of time in which this emissions unit and/or its control device was not operated according to the requirements of this permit and/or subpart.

The excess emissions/summary and malfunction report shall be postmarked or delivered by the 30th day following the end of each calendar reporting period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:
PE shall not exceed 0.22 lb/hr and 0.97 ton/yr.

Applicable Compliance Method:

Compliance shall be demonstrated using an emission factor derived from Method 5 test results from a similar emissions unit and applying it in the following calculation: 0.03 grain per dry standard cubic feet of air flow, multiplied by a stack flow of 862 dry standard cubic feet per minute, by 60 minutes per hour, and by 1 pound per 7000 grains. This limit also represents a 98.5% afterburner control efficiency, if based on an uncontrolled emission rate calculated using a 14.5 lb PE/ton metal charged emission factor (SCC 3-04-001-01) and process weight rate of 1 ton of metal charged per hour. The annual rate is derived by multiplying the hourly rate by the 8760 hours per year and dividing by 2000 pounds per ton.

- b. Emission Limitations:
OC emissions shall not exceed 0.05 lb/hr and 0.21 ton/yr.

Applicable Compliance Method:

Compliance shall be demonstrated through estimated emissions calculations, using an emission factor of 2.4 lbs OC/ton metal (SCC 3-04-001-01) multiplied by the process weight rate of 1 ton of metal charged per hour, and times (1 - 0.98), the afterburner control efficiency for OC. The annual rate is derived by multiplying the hourly rate by the 8760 hrs/yr and dividing by 2000 lbs/ton.

- c. Emission Limitations:
SOx emissions shall not exceed 3.5 lbs/hr and 15.3 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated through estimated emissions calculations, using an

Emissions Unit ID: P002

emission factor of 3.5 lbs SO_x/ton metal (SCC 3-04-001-01) multiplied by the process weight rate of 1 ton of metal charged per hour. The annual rate is derived by multiplying the hourly rate by the 8760 hrs/yr and dividing by 2000 pounds per ton.

- d. Emission Limitations:
NO_x emissions shall not exceed 0.6 lb/hr and 2.63 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated through estimated emissions calculations, using an emission factor of 0.6 lb NO_x/ton metal (SCC 3-04-001-01) multiplied by the process weight rate of 1 ton of metal charged per hour. The annual rate is derived by multiplying the hourly rate by the 8760 hrs/yr and dividing by 2000 pounds per ton.

- e. Emission Limitations:
CO emissions shall not exceed 0.4 lb/hr and 1.75 tons/yr

Applicable Compliance Method:

Compliance shall be demonstrated through estimated emission calculations, using an emission factor of 0.4 lb CO/ton metal (SCC 3-04-001-01) multiplied by the process weight rate of 1 ton of metal charged per hour. The annual rate is derived by multiplying the hourly rate by the 8760 hrs/yr and dividing by 2000 pounds per ton.

- f. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 5% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by visible emissions monitoring performed in accordance with 40CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - 2000 lbs/hr Natural Gas-Fired Max 4000 Sweat Furnace with secondary afterburner	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None