



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
FRANKLIN COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-12167

Fac ID: 0125042360

DATE: 9/4/2007

G-Cor Automotive
Stanley Greenblott
2100 Refugee Rd
Columbus, OH 43207

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 9/4/2007
Effective Date: 9/4/2007**

FINAL PERMIT TO INSTALL 01-12167

Application Number: 01-12167
Facility ID: 0125042360
Permit Fee: **\$500**
Name of Facility: G-Cor 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

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. 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 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 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 (i.e., postmarked) 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.)

3. Records Retention Requirements

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.

4. 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

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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.

5. 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 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. 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).

6. 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.

7. 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.

8. 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.

9. Construction of New Sources(s)

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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.

10. 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.

11. 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.

12. 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.

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13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(s) covered by this permit.

14. 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.

15. 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.

B. 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>
SO ₂	0.13
NO _x	3.97
VOC	0.09
PM ₁₀	1.70

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. 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.

Operations, Property, and/or Equipment - (P003) - Max 4000 Sweat Furnace with 1.5 MMBTU/hr Secondary Afterburner (2000 lbs/hr natural gas-fired)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See section A.2.a below.
OAC rule 3745-17-07(A)(1)	See section A.2.e below.
OAC rule 3745-17-11(A)(2)	See section A.2.e below.
40 CFR 63.1505(f) Subpart RRR	Dioxin/Furan emissions shall not exceed 0.8 nanogram TEQ per dry standard cubic meter at 11% oxygen. See sections A.2.b, A.2.c and A.2.d below.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) do not apply to the particulate matter (PM), particulate matter 10 microns and less in diameter (PM₁₀), particulate matter 2.5 microns and less in diameter (PM_{2.5}), organic compounds (OC) assume volatile organic compounds (VOC) are a subset of OC and that most of OC if not all, VOC), sulfur dioxide (SO₂) and nitrogen oxide (NO_x) emissions from this air contaminant source since the calculated annual emissions rate for PM, PM₁₀, PM_{2.5}, OC, SO₂ and NO_x are less than 10 tons per year. The PM, PM₁₀, PM_{2.5} and OC emissions take into account the federally enforceable restrictions of 40 CFR 63.1505(f), Subpart RRR.
- 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.

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- 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/furnace 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 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

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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
- vii. A maintenance schedule for the afterburner that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

2.d 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.

2.e The emission limitation specified by this rule is less stringent than emission limitation established pursuant to 40 CFR 63.1505(f), Subpart RRR.

B. 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.

C. 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

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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;

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- i. Documentation, for the burn cycle that follows the inspection, that the afterburner is operating properly and any necessary adjustments have been made; and
- 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

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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.

D. 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

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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
- 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.

E. 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 Limitation:
Dioxin/Furnace emissions shall not exceed 0.8 nanogram TEQ per dry standard cubic meter at 11% oxygen.

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Applicable Compliance Method:

A performance test to demonstrate compliance with the emission limitation is not required, provided that an operating temperature of 1600 F or greater is maintained in the afterburner with a design residence time of 0.8 seconds or greater.

b. Emission Limitations:

The potential to emit for PM, PM₁₀, PM_{2.5}, OC, NO_x and SO₂ are less than 10 tons per year for each pollutant.

Applicable Compliance Method:

The calculations were derived from emission factors in the U.S. EPA's Fire database under SCC 3-04-001-01 for a secondary aluminum sweat furnace for uncontrolled emissions at a process weight rate of 3,000 lbs/hr. The PM, PM₁₀, PM_{2.5} and OC emissions were reduced by 98% to account for the minimal control efficiency of the secondary afterburner.

If required, the permittee shall demonstrate compliance with these emission limitation using Methods 1 through 4 and 5, 18, 7 and 6 of 40 CFR, Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-18-04(E) and (F). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

F. Miscellaneous Requirements

None

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SIC CODE 5093 SCC CODE 3-04-001-01 EMISSIONS UNIT ID P003
 EMISSIONS UNIT DESCRIPTION Max 4000 Sweat Furnace with 1.5 MMBTU/hr Secondary Afterburner (2000 lbs/hr natural gas-fired)
 DATE INSTALLED 08/2007

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀				0.25	1.1
Sulfur Dioxide				0.03	0.13
Organic Compounds				0.18	0.78
Nitrogen Oxides				0.9	3.97
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **Subpart RRR** NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____