



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

7/15/2010

Mr. Jonathan Shade
Newman Technology, Inc
100 Cairns Rd.
Mansfield, OH 44903

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0370010118
Permit Number: P0087523
Permit Type: Renewal
County: Richland

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Kevin Boyce," 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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Newman Technology, Inc**

Facility ID: 0370010118
Permit Number: P0087523
Permit Type: Renewal
Issued: 7/15/2010
Effective: 7/15/2010
Expiration: 11/21/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
Newman Technology, Inc

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Authorization

Facility ID: 0370010118
Application Number(s): A0018528
Permit Number: P0087523
Permit Description: Renewal PTIO for metal parts coating line, K001.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 7/15/2010
Effective Date: 7/15/2010
Expiration Date: 11/21/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Newman Technology, Inc
100 CAIRNS RD
Mansfield, OH 44903

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: P0087523
Permit Description: Renewal PTIO for metal parts coating line, K001.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	Metal Parts Coating Line w/ Thermal Oxidizer
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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 submitting¹ 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 emissions 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

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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. **K001, Metal Parts Coating Line w/ Thermal Oxidizer**

Operations, Property and/or Equipment Description:

Miscellaneous metal parts paint line with regenerative 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. d)(4)

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Miscellaneous Metal Parts Spray Booth Operation with Dry Filter		
a.	OAC rule 3745-31-05(A)(3)	1.68 lbs organic compound (OC)/hr; 7.36 tons OC/yr including cleanup material usage See b)(2)a.
b.	OAC rule 3745-21-09(B)(6)	See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(1) and c)(2)
2.6 mmBTU/hr Natural Gas Fired Cure Oven		
a.	OAC rule 3745-31-05(A)(3)	0.25 lb nitrogen oxides (NOx)/hr; 1.10 tons NOx/yr 0.21 lb carbon monoxide (CO)/hr; 0.92 ton CO/yr
b.	OAC rule 3745-21-08(B)	See b)(2)c.
4.0 mmBTU/hr Natural Gas Fired Regenerative Thermal Oxidizer		
a.	OAC rule 3745-31-05(A)(3)	0.71 lb NOx/hr; 3.11 tons NOx/yr 0.82 lb CO/yr; 3.59 tons CO/yr
b.	OAC rule 3745-21-08(B)	See b)(2)c.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) control requirement for this emissions unit has been determined to be the use of a regenerative thermal oxidizer (RTO) and compliance with the terms and conditions of this permit. The RTO shall meet a minimum control efficiency of 95% (100% capture).
- b. The emissions limitation pursuant to this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. The permittee has satisfied the the “best available control techniques and practices” required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On November 5,2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the “best available control techniques and operating practices” still exists as part of the federally approved SIP for Ohio.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modification deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) The average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- (4) The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with Method 204 of 40 CFR, Part 51, Appendix M. The PTE shall meet the following criteria:
 - a. Any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. The total area of all NDO’s shall not exceed 5 percent of the surface area of the enclosure’s 4 walls, floor and ceiling;

- c. The average facial velocity (FV), of air through all NDO's shall be at least 3600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (s) shall be closed during routine operation of the process; and
 - e. All OC emissions must be captured and contained for discharge through a control device.
- (5) The permanent total enclosure shall be maintained under a negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, whenever this emissions unit is in operation.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall operate and maintain continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee.
- 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 regenerative thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. A log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.
- (2) The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
- (3) The permittee shall collect and record the following information each month for the coating operating:
- a. The company identification for each coating/cleanup material employed;
 - b. The number of gallons of each coating/cleanup material employed;

- c. The organic compound content, in lbs/gallon, as applied of each coating/cleanup material employed;
 - d. The total controlled organic emission rate for all coatings and cleanup materials, in lbs/month (the controlled organic emission rate shall be calculated using the information in d)(3)b. and d)(3)c. above and the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance); and
 - e. The annual year-to-date organic compound emission from all coatings and cleanup materials [i.e., the sum of d)(3)d. for each month to date from January to December].
- (4) The permit to install for this emissions unit was evaluated based on the actual materials (typically coating and cleanup materials) and the design parameters of this emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy") was applied for each pollutant emitted by the emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene*

TLV (mg/m³): 434.2

Maximum Hourly Emission Rate (lbs/hr): 1.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4.843

MAGLC (ug/m³): 10338

*All air toxic emissions assumed to be Xylene since Xylene is the worst case pollutant

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically coating and cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (i.e., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc].

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (Other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to change.

The permittee shall collect, record and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
 - (6) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
 - (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
 - (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

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) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 12 months after permit issuance and within 12 months of permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the 1.68 lbs OC/hr and the ninety-five percent destruction efficiency requirements for the thermal incinerator;
 - c. The following test method(s) shall be employed to demonstrate compliance with the requirements of f)(1)b. above: Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A. The test methods which must be employed to demonstrate compliance with the control efficiency for OC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
 - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR, Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with USEPA's "Guidelines for Determining Capture Efficiency," date January 9, 1995 (The Ohio EPA will consider the request, including an evaluation of the applicability necessity, and validity of any other applicable requirement).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 204 through 204F, as specified in 40 CFR, Part 51, Appendix M. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases”;

- e. The test(s) shall be conducted while the emission unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the appropriate Ohio EPA District Office or local air agency. The “Intent to Test” notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office’s or local air agency’s refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report of the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

- (2) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
1.68 lbs OC/hr; 7.36 tons OC/yr including cleanup material usage

Applicable Compliance Method:

Compliance with the lb/hr limitation shall be determined in accordance with the test methods and procedures Methods 1-4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

The annual limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated. V

- b. Emission Limitation:
0.25 lb NO_x/hr; 1.10 tons NO_x/yr from the cure oven

Applicable Compliance Method:

The hourly and annual emission limitations represent the potential to emit* of the emissions unit. Therefore, no monitoring and record keeping, reporting, or compliance method calculations are required to demonstrate compliance with these limitations. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

*The hourly emission limitation is based on a maximum heat input of 2.6 mmBTU/hr, 1020 BTU/scf and an emission factor of 100 lbs NO_x/million scf from AP-42, Table 1.4-1 (7/98). The annual potential to emit is based on the hourly potential to emit and a maximum operating schedule of 8760 hr/yr.

- c. Emission Limitation:
0.21 lb CO/hr; 0.92 ton CO/yr from the cure oven

Applicable Compliance Method:

The hourly and annual emission limitations represent the potential to emit* of the emissions unit. Therefore, no monitoring and record keeping, reporting, or compliance method calculations are required to demonstrate compliance with these limitations. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

* The hourly emission limitation is based on a maximum heat input of 2.6 mmBTU/hr, 1020 BTU/scf and an emission factor of 84 lbs CO/million scf from AP-42, Table 1.4-1 (7/98). The annual potential to emit is based on the hourly potential to emit and a maximum operating schedule of 8760 hr/yr.

- d. Emission Limitation:
0.71 lb NO_x/hr; 3.11 tons NO_x/yr from RTO natural gas combustion and oxidation of OC's in RTO

Applicable Compliance Method:

The hourly and annual emission limitations represent the potential to emit* of the emissions unit. Therefore, no monitoring and record keeping, reporting, or compliance method calculations are required to demonstrate compliance with these limitations. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

The hourly potential to emit for this emissions unit is based on the summation of emissions associated with natural gas combustion and oxidation of OC's in the RTO and is based on the following equation: Total Emissions= \sum natural gas combustion + emissions from oxidation of OC's**

*Natural gas combustion emissions: based on a maximum heat input of 4.0 mmBTU/hr, 1020 BTU/scf and an emission factor of 100 lbs NO_x/million scf from AP-42, Table 1.4-1 (7/98) [0.39 lb/hr].

**Oxidation of OC's: based on an emission factor of 2.44 grams NOx/minute, a conversion factor of 1 lb/454 grams, and a conversion factor of 60 minutes/hr (0.32 lb/hr).

The annual potential to emit is based on the hourly potential to emit and a maximum operating schedule of 8760 hrs/yr.

- e. Emission Limitation:
0.82 lb CO/hr; 3.59 tons CO/yr from RTO natural gas combustion and oxidation of OC's in RTO

Applicable Compliance Method:

The hourly and annual emission limitations represent the potential to emit* of the emissions unit. Therefore, no monitoring and record keeping, reporting, or compliance method calculations are required to demonstrate compliance with these limitations. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

The hourly potential to emit for this emissions unit is based on the summation of emissions associated with natural gas combustion and oxidation of OC's in the RTO and is based on the following equation: Total Emissions= \sum natural gas combustion + emissions from oxidation of OC's**

*Natural gas combustion emissions: based on a maximum heat input of 4.0 mmBTU/hr, 1020 BTU/scf and an emission factor of 84 lbs CO/million scf from AP-42, Table 1.4-1 (7/98) [0.33 lb/hr].

**Oxidation of OC's: based on an emission factor of 3.72 grams CO/minute, a conversion factor of 1 lb/454 grams, and a conversion factor of 60 minutes/hr (0.49 lb/hr).

The annual potential to emit is based on the hourly potential to emit and a maximum operating schedule of 8760 hrs/yr.

- g) Miscellaneous Requirements

- (1) None.