



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08953

Fac ID: 0165010026

DATE: 4/19/2005

General Electric Circleville Lamp Plant
Joseph Pohlman
559 E Ohio St
Circleville, OH 43113

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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 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: 4/19/2005
Effective Date: 4/19/2005**

FINAL PERMIT TO INSTALL 01-08953

Application Number: 01-08953
Facility ID: 0165010026
Permit Fee: **\$200**
Name of Facility: General Electric Circleville Lamp Plant
Person to Contact: Joseph Pohlman
Address: 559 E Ohio St
Circleville, OH 43113

Location of proposed air contaminant source(s) [emissions unit(s)]:
**559 E Ohio St
Circleville, Ohio**

Description of proposed emissions unit(s):
Lamp assembly group 4--P038.

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

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.

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PTI Application: 01-08953
Issued: 4/19/2005

Facility ID: 0165010026

9. Compliance Requirements

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

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Issued: 4/19/2005

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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 application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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 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>
OC (process)	7.45
OC (fuel burning)	0.03
VOC (coating)	21.0
Hg	0.19
NOx	0.27
SO2	0.002
PE	0.004
CO	0.22

General Electric Circleville Lamp Plant

PTI Application: 01-08953

Issued: 4/19/2005

Facility ID: 0165010026

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Gener

PTI A

Issued: 4/19/2005

Emissions Unit ID: P038

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

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>
P038 - lamp assembly group 4, including mount assembly, sealer, exhaust machine, basing unit, Dri-film applicator, seasoning and testing, and packaging	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(1) OAC rule 3745-18-06(E)(2) OAC rule 3745-21-09(U)(1)

**Gener
PTI A
Issued: 4/19/2005**

Emissions Unit ID: P038

Applicable Emissions Limitations/Control Measures	See Sections A.I.2.a through A.I.2.c below.
1.7 lbs/hr and 7.45 tons per year (TPY) organic compounds (OC) for the assembly process;	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
0.007 lb/hr and 0.03 TPY OC for the combustion of natural gas; and 4.8 lbs/hr and 21.0 TPY volatile organic compounds (VOC) for the surface coating operation	The emissions limitations specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
0.044 lb/hr and 0.19 TPY mercury (Hg) emissions	The emissions limitations specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
0.06 lb/hr and 0.27 TPY nitrous oxides (NO _x)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
0.0004 lb/hr and 0.002 TPY sulfur dioxide (SO ₂)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
0.001 lb/hr and 0.004 TPY particulate emissions (PE) for the combustion of natural gas	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
0.05 lb/hr and 0.22 TPY carbon monoxide (CO)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1), 18-06(E)(2) and 21-09(U)(1).	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2. Additional Terms and Conditions

- 2.a** The permittee shall vent all mercury (Hg) emissions from this emissions unit to a carbon adsorption unit.
- 2.b** The permittee shall maintain the carbon adsorption system controlling the central vacuum system which serves emissions units: P004-group 18, P019-group 14, P024-group 16, P025-group 25, P026-group 26, P029-group 12, P038-group 4, P039-group 7, P040-group 10, P041-group 11, P042-group 22, P043-group 24 and P044-group 17 at a control efficiency of at least 90% for Hg and a Hg emission rate of less than 0.0196 lb/hr at all times.
- 2.c** The hourly and annual emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, recordkeeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain a log identifying the dates when the carbon, used in the carbon adsorber serving this emissions unit, is replaced.
3. The permittee shall maintain the following records on a daily basis:
 - a. the company identification for each coating material employed;
 - b. the number of gallons of each coating material employed;
 - c. the VOC content of each coating material, in pounds per gallon; and
 - d. the VOC content of all coating materials employed in this emissions unit as determined by equation $(C_{VOC,2})_A$ from OAC rule 3745-21-10(B)(9).

IV. Reporting Requirements

General Electric Circleville Lamp Plant

PTI Application: 01 09052

Issued

Facility ID: 0165010026

Emissions Unit ID: P038

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, Central District Office (CDO) within 30 days of the deviation.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the coating VOC content limitation specified above in Section A.I.1 above. These reports shall be submitted to the Ohio EPA, CDO by the dates specified in Part I, Section A.1 of this permit.
3. The permittee shall submit annual reports which specify the total emissions from this emissions unit. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Title V Fee Emissions Report. These reports shall be submitted to the Ohio EPA, CDO by the dates specified in Part I, Section A.1 of this permit.

V. Testing Requirements

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

- a. Emission Limitation:
1.7 lbs/hr OC for the assembly process

Applicable Compliance Method:

Compliance may be demonstrated by the following calculation:

$$(2000 \text{ lamps/hr})(2 \text{ bases/lamp})(2.6 \text{ grams base cement/base})(1 \text{ lb}/454 \text{ grams}) \\ (0.074 \text{ lb OC/lb base cement}) = 1.7 \text{ lbs OC/hr}$$

where:

2000 lamps/hr= maximum production rate

2 bases/lamp= maximum number of bases per lamp

2.6 grams base cement/base= maximum amount of cement applied to each base

0.074 lb OC/lb base cement= OC content of base cement

- b. Emission Limitation:
0.007 lb/hr OC for the combustion of natural gas
- Applicable Compliance Method:
 $(609 \text{ ft}^3/\text{hr})(11 \text{ lbs OC}/10^6 \text{ scf}) = 0.007 \text{ lb OC/hr}$
- where:
609 ft³/hr= maximum fuel usage
11 lbs OC/10⁶ scf= AP-42 emissions factor for natural gas combustion
- c. Emission Limitation:
4.8 lbs/hr VOC for the surface coating operation
- Applicable Compliance Method:
Compliance may be demonstrate by the following calculation:
 $(3.5 \text{ lbs VOC/gal})(1.37 \text{ gals/hr}) = 4.8 \text{ lbs/hr VOC}$
- where:
3.5 lbs VOC/gal= allowable VOC content in coating
1.37 gals/hr= maximum coating usage
- d. Emission Limitation:
0.044 lb/hr Hg
- Applicable Compliance Method:
Compliance may be demonstrated by the following calculation:
 $(0.44 \text{ lb Hg/hr})(1-0.90) = 0.044 \text{ lb/hr Hg}$
- where:
0.44 lb Hg/hr= maximum hourly Hg usage rate
90% efficiency= minimum efficiency rating of carbon adsorption system
- e. Emission Limitation:
0.06 lb/hr NO_x
- Applicable Compliance Method:
Compliance may be demonstrated by the following calculation:
 $(609 \text{ ft}^3/\text{hr})(100 \text{ lbs NO}_x/10^6 \text{ scf}) = 0.06 \text{ lb NO}_x/\text{hr}$
- where:

100 lbs NO_x/10⁶ scf= AP-42 emissions factor for natural gas combustion

- f. Emission Limitation:
0.0004 lb/hr SO₂

Applicable Compliance Method:
Compliance may be demonstrated by the following calculation:
(609 ft³/hr)(0.6 lbs SO₂/10⁶ scf) = 0.0004 lb SO₂/hr

where:
0.6 lbs SO₂/10⁶ scf= AP-42 emissions factor for natural gas combustion

- g. Emission Limitation:
0.001 lb/hr PE

Applicable Compliance Method:
Compliance may be demonstrated by the following calculation:
(609 ft³/hr)(1.9 lbs PE/10⁶ scf) = 0.001 lb PE/hr

where:
1.9 lbs PE/10⁶ scf= AP-42 emissions factor for natural gas combustion

- h. Emission Limitation:
0.05 lb/hr CO

Applicable Compliance Method:
Compliance may be demonstrated by the following calculation:
(609 ft³/hr)(84 lbs CO/10⁶ scf) = 0.05 lb CO/hr

where:
84 lbs CO/10⁶ scf= AP-42 emissions factor for natural gas combustion

- i. Emission Limitation:
7.45 TPY OC (process)
0.03 TPY OC (fuel burning)
21.0 TPY VOC (coating)
0.19 TPY Hg
0.27 TPY NO_x
0.002 TPY SO₂
0.004 TPY PE

0.22 TPY CO

Applicable Compliance Method:

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained. The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year and dividing by 2000 lbs/ton.

- j. Emission Limitation:
20% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- k. Emission Limitation:
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be determined based on the monitoring and recordkeeping requirements specified in Section A.III.3 above.

2. The carbon adsorption system controlling the central vacuum system which serves emissions units P004-group 18, P019-group 14, P024-group 16, P025-group 25, P026-group 26, P029-group12, P038-group 4, P039-group 7, P040-group10, P041-group 11, P042-group 22, P043-group 24 and P044-group 17 shall maintain a control efficiency of at least 90% for mercury and a mercury emission rate of less than 0.0196 pound per hour at all times.

The permittee shall conduct, or have conducted, emission testing for the central vacuum system in accordance with the following requirements:

- a. the emission testing shall be conducted in accordance with the Title V permit;
- b. the emission testing shall be conducted to demonstrate compliance with the control efficiency requirement for mercury;
- c. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for mercury and demonstrate compliance by emission testing as specified in Section A.V.2: USEPA Test Methods 1 through 4 and 29 or 101 of 40 CFR Part 60, Appendix A (alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA); and
- d. the test shall be conducted while the following emissions units are operating at or near maximum capacities unless otherwise specified or approved by the Ohio EPA: P004-group 18, P019-group 14, P024-group 16, P025-group 25, P026-group 26, P029-group12, P038-group 4, P039-group 7, P040-group10, P041-group 11, P042-group 22,

P043-group 24 and P044-group 17.

3. The OC content of the coatings, thinners, or additives, and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Method 24 shall be used to determine the OC contents for coatings. If an owner or operator determines that Method 24 of 40 CFR Part 60, Appendix A, cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

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>
P038 - lamp assembly group 4	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