



Environmental  
Protection Agency

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

8/3/2010

Certified Mail

Dr. Robert Feltz  
SHOWA Aluminum Corporation of America  
10500 O'Day-Harrison Rd  
Mt. Sterling, OH 43143-9474

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0149000088  
Permit Number: P0106305  
Permit Type: Administrative Modification  
County: Madison

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://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

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA  
Ohio EPA-CDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
SHOWA Aluminum Corporation of America**

Facility ID: 0149000088  
Permit Number: P0106305  
Permit Type: Administrative Modification  
Issued: 8/3/2010  
Effective: 8/3/2010





Division of Air Pollution Control
Permit-to-Install
for
SHOWA Aluminum Corporation of America

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## Authorization

Facility ID: 0149000088

Facility Description: Aluminum manufacturing

Application Number(s): A0038526, A0039443

Permit Number: P0106305

Permit Description: Administrative modification (PTI P0104397) to the terms and conditions of EU P304 to address revised emissions levels, require control equipment and identify the applicable requirements of OAC rule 3745-21-09.

Permit Type: Administrative Modification

Permit Fee: \$200.00

Issue Date: 8/3/2010

Effective Date: 8/3/2010

This document constitutes issuance to:

SHOWA Aluminum Corporation of America  
10500 O'Day-Harrison Rd  
Mt. Sterling, OH 43143-9474

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

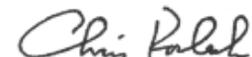
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the 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 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



## **Authorization (continued)**

Permit Number: P0106305  
Permit Description: Administrative modification (PTI P0104397) to the terms and conditions of EU P304 to address revised emissions levels, require control equipment and identify the applicable requirements of OAC rule 3745-21-09.

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

<b>Emissions Unit ID:</b>	<b>P304</b>
Company Equipment ID:	Chip sprayer
Superseded Permit Number:	P0104397
General Permit Category and Type:	Not Applicable



## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. 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 re-issuance, or modification.

- 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, 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 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.

#### 4. Monitoring and Related Record Keeping 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:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) 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:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

- (2) 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 Ohio EPA DAPC, Central District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, 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.
  - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office 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).

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) 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.
- c) 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:



- (1) 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.
  - (2) 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.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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.

**7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. 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.

**9. 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 Ohio EPA DAPC, Central District Office.

- 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 Ohio EPA DAPC, Central District Office. 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.)

**10. 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).

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

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).

## 13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.



- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. 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.

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. 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.

**19. 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.

## **B. Facility-Wide Terms and Conditions**

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.

## **C. Emissions Unit Terms and Conditions**



1. **P304, Chip sprayer**

**Operations, Property and/or Equipment Description:**

Chip sprayer controlled by permanent total enclosure venting to a catalytic incinerator

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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
a.	OAC rule 3745-31-05(F) (Voluntary limits on allowable emissions)	See b)(2)a.  The requirements of this rule also include compliance with OAC rule 3745-21-09(O).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions from the conveyORIZED degreaser shall not exceed 0.49 pound per hour (lb/hr) and 2.16 tons per year (TPY). See b)(2)a.  Emissions from the combustion of natural gas in the catalytic incinerator serving this emissions unit shall not exceed the following:  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 0.10 lb/hr and 0.44 TPY;  Particulate emissions (PE) shall not exceed 0.008 lb/hr and 0.03 TPY;  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.0006 lb/hr and 0.003 TPY;  Carbon monoxide (CO) emissions shall not exceed 0.084 lb/hr and 0.37 TPY; and  OC emissions shall not exceed 0.006 lb/hr and 0.02 TPY.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b., b)(2)d. and b)(2)e.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-21-09(O)(4)	The emissions limitations and operational restrictions specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(F).  See b)(2)e.

(2) Additional Terms and Conditions

- a. The permittee has accepted the following voluntary restrictions pursuant to OAC rule 3745-31-05(F):
  - i. the use of a permanent total enclosure venting to a catalytic incinerator with a minimum destruction efficiency of 95%;
  - ii. workplace fans shall not be placed near the conveyORIZED degreaser openings;
  - iii. the conveyORIZED degreaser shall be operated in a manner to prevent cleaned parts from carrying out solvent liquid or vapor including racking parts so that solvent drains freely from parts and is not trapped;
  - iv. downtime covers shall be placed over entrances and exits of the conveyORIZED degreaser at all times when the conveyors and exhausts are not being operated;
  - v. waste solvent shall be stored in covered containers;
  - vi. solvent leaks shall be repaired immediately, or the conveyORIZED degreaser shall be shut down; and
  - vii. porous and/or absorbent materials shall not be cleaned in the conveyORIZED degreaser.
  
- b. The permittee has satisfied the best available technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA

approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

- c. The following rule paragraph will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this emissions unit or the PE, CO, SO<sub>2</sub>, NO<sub>x</sub> and OC emissions related to the combustion of natural gas in the catalytic incinerator serving this emissions unit because the potential to emit for each of these pollutants is less than ten tons per year.

- d. The hourly VOC emissions limitation was established to reflect the potential-to-emit for the conveyORIZED degreaser as vented to a catalytic incinerator through the use of a permanent total enclosure and in accordance with the information provided in the PTI application. The monitoring and/or recordkeeping, reporting and testing requirements that ensure that VOC emissions from this emissions unit are captured and directed to the catalytic incinerator are sufficient to ensure compliance with this limit.
- e. The PE, CO, SO<sub>2</sub>, NO<sub>x</sub> and OC limitations were established to reflect the potential-to-emit for each pollutant related to the combustion of natural gas in the catalytic incinerator in accordance with the information provided in the PTI application. It is not necessary to establish monitoring and recordkeeping or reporting requirements to ensure compliance with these limitations.

c) **Operational Restrictions**

- (1) VOC emissions from this emissions unit shall be controlled through the use of a permanent total enclosure venting to a catalytic incinerator whenever the emissions unit is in operation.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. the types of solvents employed in the conveyORIZED degreaser; including the chemical name(s), solvent concentration and/or VOC content;
- b. the total solvent added to the conveyORIZED degreaser or the amount purchased for use in the emissions unit;
- c. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year;
- d. the difference between the solvent used or purchased and the used solvent shipped offsite;

- e. the date and amount of time any cover, for closing off the entrance and exit, was removed or left open when the conveyorized degreaser was not in use, except during maintenance activities;
- f. the date and a detailed description of any maintenance performed on the catalytic incinerator; and
- g. any period of time (start time and date, and end time and date) during which the conveyorized degreaser was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable temperature of the exhaust gases immediately before the catalyst bed, during any period of time when the emissions unit(s) controlled by the catalytic incinerator is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. The acceptable temperature difference across the catalyst bed (when the emissions unit(s) is/are in operation), shall not be less than 80 percent of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
- (3) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The continuous monitoring and recording devices shall be capable of accurately measuring the desired parameter and the owner or operator shall properly operate and maintain the devices in accordance with the manufacturer's recommendations. The acceptable temperature settings shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
  - b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature difference across the catalyst bed was less than 80 percent of the average

temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

- c. a log or record of the operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit(s).

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed. These records shall be maintained at the facility for a period of no less than 3 years.

- (4) Whenever the monitored average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s)/limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature of the exhaust gases immediately before the catalyst and the average temperature difference across the catalyst bed immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (5) The temperature ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range(s) based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) of the controlled pollutant(s). In addition, approved revisions to the temperature range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed was outside of the ranges specified by the manufacturer and/or outside of the acceptable ranges following any required compliance demonstration;
  - any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the catalytic incinerator;
  - each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
  - each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed into compliance with the acceptable range(s), was determined to be necessary and was not taken;
  - each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s);
  - any period of time during which any cover, for closing off the entrance and exit, was removed or left open when the conveyORIZED degreaser was not in use, except during maintenance activities; and
  - any period of time during which the conveyORIZED degreaser was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.
- (3) The reports required by this permit shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

## f) Testing Requirements

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

## a. Emissions Limitation:

VOC emissions shall not exceed 0.49 lb/hr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

## Applicable Compliance Method:

This emissions limitation was established by multiplying the maximum amount of solvent used per hour (1.50 gallons) by the VOC content of the solvent (6.59 lbs/gal) and accounting for the required destruction efficiency (95%).

## b. Emissions Limitation:

VOC emissions shall not exceed 2.16 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

## Applicable Compliance Method:

This emissions limitation was established by multiplying the maximum amount of solvent used per year (13,140 gallons) by the VOC content of the solvent (6.59 lbs/gal), accounting for the required destruction efficiency (95%) and then dividing by 2,000 pounds per ton.

## c. Emissions Limitation:

Emissions from the combustion of natural gas in the catalytic incinerator serving this emissions unit shall not exceed the following (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP):

NO<sub>x</sub> = 0.10 lb/hr and 0.44 TPY;  
PE = 0.008 lb/hr and 0.03 TPY;  
SO<sub>2</sub> = 0.0006 lb/hr and 0.003 TPY;  
CO = 0.084 lb/hr and 0.37 TPY; and  
OC = 0.006 lb/hr and 0.02 TPY.

## Applicable Compliance Method:

The lb/hr emissions limitations were established by multiplying the maximum amount of natural gas usage (1,000 scfm) by the AP-42\* emissions factors found in Tables 1.4-1 and 1.4-2.

The annual emissions limitations are based on the hourly potential-to-emit and a maximum operating schedule of 8,760 hrs/yr.

\*AP-42 Section 1.4, Natural Gas Combustion for External Combustion Sources, July 1998.

- (2) The permittee demonstrated compliance with the capture and destruction efficiency requirements established for the enclosure and catalytic incinerator through performance tests performed on March 23, 2010.

If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted to demonstrate compliance with the 95% destruction efficiency requirement established for the catalytic incinerator.
- b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Methods 1-4 and Method 18, Method 25 or Method 25A of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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 the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

- c. The test(s) shall be conducted while the emissions 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.
- d. 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).
- e. 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.



- (3) A comprehensive written report on the results of the emissions 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.
  
- g) Miscellaneous Requirements
  - (1) None.