Ohio Environmental Protection Agency

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

Certified Mail

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

10/18/2010

MATTHEW DAWSON
PREMIER MFG. CORP.
12117 BENNINGTON AVE
CLEVELAND, OH 44135

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318005421
Permit Number: P0105839
Permit Type: Initial Installation
County: Cuyahoga

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
CDAQ; Pennsylvania; Canada

Permit Strategy Write-Up

1. **Check all that apply:**

   _X_ Synthetic Minor Determination to avoid Title V

   ____ Netting Determination

2. **Source Description:**

   Premier manufactures welded wire products for the heating and air conditioning industry sector. These items include fan guards, grills, motor mounts, and wire forms. Some of the parts are electro-zinc plated (P002) and some of these parts are powder coated with PVC and then the coated parts undergo curing (K001). The wire hooks used for this process are cleaned using a burn-off oven (N003). This oven is a Pollution Control Products PR-510. The primary chamber (0.4 mmBtu/hr) and the secondary afterburner chamber (0.52 mmBtu/hr) are natural-gas fired. Pollutants of concern are PE and HCl.

3. **Facility Emissions and Attainment Status:**

   This facility has the potential to emit for a single HAP – HCl - that is greater than 10 tpy. Emissions unit N003 has a potential to emit of 13.14 tpy HCl, and emissions unit P002 has a potential to emit of 1.8 tpy HCl, for a combined total of 14.94 tpy HCl. The actual facility emissions for HAPs were calculated at 3.28 tpy per PTIO applications for N003, P002, and K001. Cuyahoga County is currently designated as non-attainment for PM2.5.

4. **Source Emissions:**

   Since the potential to emit for HCl is greater than 10 tpy for a single HAP, this would make Premier Manufacturing subject to the Title V regulations. Premier has chosen to obtain federally enforceable permit restrictions for emissions unit N003 in order to keep HCl emissions below 10 tpy for the entire facility. This will be accomplished by restricting the amount of resin material per batch to 64 pounds, and limiting the number of batches processed per year to 676 batches per rolling, 12-month period. By restricting the number of batches and the amount of resin material per batch, this will restrict HCl emissions for N003 to 8.11 tons/year as a rolling, 12-month summation. Adding in the potential to emit for P002 of 1.8 tpy HCl, the total facility HCl emissions will be 9.91 tpy. The only other HAP of concern for the facility is formaldehyde from emissions unit K001 which has a potential to emit less than 1 ton/year. Therefore, total combined HAPs for the facility are also less than 25 tons/year.

   Calculation Summary (Tons Per Year)

Pollutant	Actual	PTE (N003)	PTI Allowable (N003)
PE	0.09	0.47	0.47
HAP (HCl)	3.28	13.14	8.11

5. **Conclusion:**

   The potential to emit HCl for Premier exceeds 10 tons/year. By establishing a federally enforceable limit for N003 on the annual number of batches processed, based on a rolling 12-month summation of the number of batches, along with a restriction on the amount of resin material per batch, this will restrict HCl

emissions to 8.11 tons/year for N003. Emissions unit P002 has a potential to emit for HCl emissions of 1.8 tpy resulting in total facility HCl emissions of 9.91 tons/year. Therefore, the facility-wide potential to emit for HCl has been restricted below the Title V major source threshold of 10 tpy for a single HAP. The total facility combined HAPs are also less than the Title V major source threshold of 25 tons/year as noted above. This facility does not have the potential to emit for criteria pollutants above the Title V major source threshold of 100 tons/year. Consequently, by establishing the federally enforceable restrictions on N003, Premier will not be subject to the Title V permitting requirements.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year (N003)
PE	0.47
HCl	8.11*

*The potential to emit for P002 is 1.8 tpy HCl; therefore, the total facility HCl will be 9.91 tpy.

Cuyahoga County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
PREMIER MFG. CORP.

Issue Date: 10/18/2010
Permit Number: P0105839
Permit Type: Initial Installation
Permit Description: This is for a burn-off oven used to clean PVC off hooks. The items coated in PVC include welded wire products for the heating and air-conditioning industry sector.
Facility ID: 1318005421
Facility Location: PREMIER MFG. CORP.
12117 BENNINGTON AVE.,
Cleveland, OH 44135
Facility Description: Other Fabricated Wire Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114 or (216)664-2297. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
PREMIER MFG. CORP.

Facility ID:	1318005421
Permit Number:	P0105839
Permit Type:	Initial Installation
Issued:	10/18/2010
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
PREMIER MFG. CORP.

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Authorization

Facility ID: 1318005421
Application Number(s): A0038838
Permit Number: P0105839
Permit Description: This is for a burn-off oven used to clean PVC off hooks. The items coated in PVC include welded wire products for the heating and air-conditioning industry sector.
Permit Type: Initial Installation
Permit Fee: $100.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/18/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

PREMIER MFG. CORP.
12117 BENNINGTON AVE.
Cleveland, OH 44135

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0105839
Permit Description: This is for a burn-off oven used to clean PVC off hooks. The items coated in PVC include welded wire products for the heating and air-conditioning industry sector.

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

Emissions Unit ID:	**N003**
Company Equipment ID:	B002
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 Cleveland Division of Air Quality 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 submitting[1] 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

[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).

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 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. N003, Bake-Off Oven

Operations, Property and/or Equipment Description:

Pyrolysis Bake Off Oven - Natural Gas Fired - Pollution Control Products PRC-510

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. b)(2)d., d)(5), d)(6), d)(7), d)(8), and e)(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. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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(A)(3), as effective 11/30/01	0.47 tons particulate emissions (PE) per year. 5 percent opacity, as a 6 minute average The requirements of this rule include compliance with the requirements of OAC rule 3745-17-09(B). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)b.(i) below.
c.	OAC rule 3745-31-05(F)	See b)(2)b.(ii) below.
d.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	24 pounds of HCl per batch; 8.11 tons per year (tpy) of HCl as a rolling, 12-month summation See c)(3) and c)(4) below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(A)	Per b)(2)a. below, pending SIP approval, the opacity limit based on this rule is less stringent than the opacity limit based on OAC rule 3745-31-05 (A)(3). After the SIP is approved by USEPA, see b)(2)c. below.
f.	OAC rule 3745-17-09(B)	0.1 pound of particulate emissions per 100 pounds of salvageable material charged.
g.	OAC rule 3745-114-01	See b)(2)d., d)(5), d)(6), d)(7), d)(8), and e)(4) below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Availiable Technology (BAT) requirements pursuant to OAC paragraph 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 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of the OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this emissions unit since the calculated annual emission rate for particulates is less than 10 tons/year, taking into account the federally enforceable rule limit of 0.1 lbs PE/100 lbs of salvageable material charged under OAC rule 3745-17-09(B).

ii. Permit to Install/Operate P0105839 for this emissions unit takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3) for hydrogen chloride (HCl) emissions:

(a) Restricting the amount of resin material per batch and restricting the annual amount of batches processed per rolling, 12-month period.

c. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

d. In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for HCl, which shall not exceed 72 pounds per day. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application, by the emission rate modeled (to determine the ground level concentration).

c) Operational Restrictions

(1) The permittee shall operate the emissions unit so that the temperature of the exhaust gases from the secondary chamber does not fall below 1500 degrees Fahrenheit.

(2) Emissions unit N003 shall be used only for its intended purpose and that is to burn excess PVC resin materials off metal hooks.

(3) The maximum amount of PVC resin material charged to the incinerator shall be limited to 64 lbs/batch.

(4) The maximum annual number of batches for this emissions unit shall not exceed 676 batches/yr, based upon a rolling, 12-month summation of the number of batches.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the secondary chamber 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. the temperature of the exhaust gases from the secondary chamber; and,

b. a log or record of operating time for the monitoring equipment and associated emissions unit.

(2) The permittee shall maintain daily records of the following:

a. the number of batches run;

b. for each batch, the total weight of the hooks and racks going into the emissions unit before and after the batch process; and

c. the pounds of PVC resin material per batch input into this emissions unit.

(3) The permittee shall maintain monthly records of the following:

a. the number of batches run; and

b. the rolling, 12-month summation of the number of batches.

(4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to eliminate the visible emissions.

(5) The federally enforceable permit-to-install and operate (FEPTIO) application for this emissions unit, N003, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., X = 3 hours per day and y = 5 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminant:

Toxic Contaminant: HCl

TLV (mg/m3): 2.2

Maximum Hourly Emission Rate (lbs/hr): 24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 583.2

MAGLC (ug/m3): 586.3

The permittee, having demonstrated that emissions of HCl, from emissions unit N003, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute", ORC 3704.03(F), 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

(8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

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.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to eliminate the visible particulate emissions.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements in term number d)(2) and d)(3) above:

a. all exceedances of the pounds of PVC resin material input into this emissions unit; and

b. all exceedances of the rolling, 12-month restriction on the number of batches for this emissions unit.

(4) The permittee shall include in the annual Permit Evaluation Report (PER) any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director, in order to maintain any toxic air contaminant below its MAGLC. The permittee shall also include in the PER any changes made, during the calendar year, to a parameter or value entered into the dispersion model that was used to maintain compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. <u>Emission Limitation</u>
0.47 tpy PE

<u>Applicable Compliance Method</u>
Compliance shall be determined by multiplying the maximum hourly resin processed (9.85 lbs resin/hr) by (1 – CE) and the actual annual hours of operation per year, and then divide by 2000 lbs/ton to determine the process particulate emissions (PE1). The control efficiency of the afterburner is 99%. Then determine the amount of PE from burning natural gas (PE2) by multiplying the total heat capacity for the primary burner (0.4 MMBtu/hr) and afterburner (0.52 MMBtu/hr) by the AP-42 emission factor of 7.6 lb PE/mmcf from Table 1.4-2 and divide by 1020 Btu/cf, then multiply by the actual annual hours of operation and divide by 2000 lbs/ton. Sum PE1 and PE2 to determine the total annual particulate emissions.

b. Emission Limitation
Visible particulate emissions from the stack shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method
Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

c. Emission Limitation
24 pounds of HCl/batch

Applicable Compliance Method
Compliance shall be determined by multiplying the maximum PVC resin charged per batch by the emission factor of 0.37 pound of HCl per pound of PVC resin charged (derived from the stack test of October 7, 1997). As long as the maximum amount of PVC resin charged per batch (64 pounds) is not exceeded and the chlorine content of the PVC resin composition is not increased, then this emission limitation should not be exceeded.

If required, compliance shall be determined using U.S. EPA test methods 1 – 4 and 26 from 40 CFR Part 60 Appendix A.

d. Emission Limitation
8.11 tons of HCl per rolling, 12-month period

Applicable Compliance Method
Compliance shall be based upon the recordkeeping in d)(2) by multiplying the rolling, 12-month summation of the number of batches times the 24 pounds of HCl/batch provided the maximum amount of PVC resin charged per batch does not exceed 64 lbs. Alternatively, compliance may be determined by multiplying the total annual resin charged, in lbs., by the factor of 0.37 lb HCl/lb resin and dividing by 2000 lbs/ton.

e. Emission Limitation
Pending SIP approval, visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average.

Applicable Compliance Method
Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

f. Emission Limitation
0.10 pounds of PE/100 pounds of salvageable material charged

Applicable Compliance Method
If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(8), using U.S. EPA test methods 1-5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.