



Environmental  
Protection Agency

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

10/25/2010

Certified Mail

David Duell  
Wright-Patterson Air Force Base  
88 ABW/CEANQ  
1450 Littrell Road - Bldg 22  
Wright-Patterson AFB, OH 45433-5209

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0829700441  
Permit Number: P0106517  
Permit Type: OAC Chapter 3745-31 Modification  
County: Greene

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 Regional Air Pollution Control Agency. 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  
RAPCA; Indiana; Kentucky





## Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	0829700441
Facility Name:	Wright-Patterson Air Force Base
Facility Description:	national security
Facility Address:	88 ABW/CEVY 1450 Littrell Road - Bldg 22 Wright-Patterson AFB, OH 45433-5209 Greene County
Permit #:	P0106517, OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Xenia Daily Gazette on 09/22/2010. The comment period ended on 10/22/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

No comments were received.





**FINAL**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Wright-Patterson Air Force Base

Facility ID: 0829700441  
Permit Number: P0106517  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 10/25/2010  
Effective: 10/25/2010





Division of Air Pollution Control
Permit-to-Install
for
Wright-Patterson Air Force Base

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## Authorization

Facility ID: 0829700441  
Facility Description: National security  
Application Number(s): A0039479  
Permit Number: P0106517  
Permit Description: PTI Modification to establish federally enforceable permit terms and conditions that will preclude compliance with NSPS Subpart FFFF  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$250.00  
Issue Date: 10/25/2010  
Effective Date: 10/25/2010

This document constitutes issuance to:

Wright-Patterson Air Force Base  
88 ABW/CEVY  
1450 Littrell Road - Bldg 22  
Wright-Patterson AFB, OH 45433-5209

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:

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

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: P0106517

Permit Description: PTI Modification to establish federally enforceable permit terms and conditions that will preclude compliance with NSPS Subpart FFFF

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>N303</b>
Company Equipment ID:	5555
Superseded Permit Number:	
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 Regional Air Pollution Control Agency.

- (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 Regional Air Pollution Control Agency. 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 Regional Air Pollution Control Agency 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 Regional Air Pollution Control 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).

## 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 Regional Air Pollution Control 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:
- (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 Regional Air Pollution Control 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 Regional Air Pollution Control Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## **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. N303, Classified Materials Incinerator**

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

NAICS - Classified Materials Incinerator with primary, secondary and tertiary afterburners

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(A)(3)	<p>The particulate emissions (PE) from this emissions unit shall not exceed 0.35 pound per hour.</p> <p>The nitrogen oxide (NOx) emissions from this emissions unit shall not exceed 0.55 pound per hour.</p> <p>The sulfur dioxide (SO<sub>2</sub>) emissions from this emissions unit shall not exceed 0.56 pound per hour.</p> <p>The carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.052 pound per hour.</p> <p>The hydrogen chloride (HCl) emissions from this emissions unit shall not exceed 1.78 pounds per hour.</p> <p>Visible PE from the stack serving this emissions unit shall not exceed 5 percent opacity as a six-minute average.</p>
b.	OAC rule 3745-31-05(D)	<p>The PE from this emissions unit shall not exceed 0.0085 ton per rolling 12-month period.</p> <p>The NOx emissions from this emissions unit shall not exceed 0.024 ton per rolling 12-month period.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The SO<sub>2</sub> emissions from this emissions unit shall not exceed 0.012 ton per rolling 12-month period.</p> <p>The CO emissions from this emissions unit shall not exceed 0.012 ton per rolling 12-month period.</p> <p>The HCl emissions from this emissions unit shall not exceed 0.039 ton per rolling 12-month period.</p> <p>See b)(2) a. and c)(1)</p>
c.	OAC rule 3745-17-09(B)	The PE from this emissions unit shall not exceed 0.1 pound per 100 pounds of material charged.
d.	OAC rule 3745-17-07(A)	The visible emissions limitations established by this rule are less stringent than the visible emissions limitations established by this rule.
e.	40 CFR Part 60, Subpart FFFF 40 CFR 60.39883(q)(2)	See b)(2)b.

(2) Additional Terms and Conditions

- a. The permittee is prohibited from burning paper and optical media (CDs and DVDs) in the incinerator except during times when the high security disintegrator (or other primary destruction device for paper and optical media) is out of service for repairs; or in an emergency situation in which there is imminent threat to life or in defense of the homeland.
- b. Incineration units are excluded from compliance with 40 CFR Part 60, Subpart FFFF if the incineration unit is used solely to incinerate national security materials, its use is necessary to safeguard national security and the Administrator has approved a request for exclusion in accordance with 40 CFR 60.39883(q)(2)(i) and (ii). Wright Patterson Air Force Base (WPAFB) submitted a request for exclusion on December 11, 2009 that was approved on March 30, 2010.

c) Operational Restrictions

- (1) The weight of material charged to the incinerator shall not exceed 350 pounds per hour.
- (2) The plastic classified material incineration rate shall not exceed 2,000 pounds per month and 15,000 pounds per rolling 12-month period. Plastic classified materials include photographs, film and negatives, viewgraph acetate, microfiche, video tapes, cassette

tapes, 3D color scan ribbons, computer cartridges/ribbons, typewriter cartridges/ribbons, rubber stamps, tape reels and rubber printing mats.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the incineration rate, upon issuance of this permit.

- (3) The permittee shall employ a lockout system on the incinerator that will prevent the charging of material to the primary chamber at all times when the exit temperature of the secondary or tertiary incineration chamber is less than 1,690 °F. The lockout system shall also prevent the recharging of material until the burn-down cycles are complete.
  - (4) The primary combustion chamber for this incinerator shall be maintained so that the exit gas is at a minimum temperature of 1,200 °F. The secondary combustion chamber for this incinerator shall be maintained so that the exit gas temperature is at a minimum of 1,690 °F. The tertiary combustion chamber for this incinerator shall be maintained so that the exit gas temperature is at a minimum of 1,800 °F.
  - (5) The incinerator shall be permitted to operate with a one hour pre-heat period during which materials may be charged to the primary chamber for the purpose of bringing the combustion chambers to the operating temperatures specified in c)(4).
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain daily records of the following information:
    - a. The weight of material charged to the incinerator, in pounds;
    - b. The hours of operation from the time material is charged to the primary incineration chamber until the incineration cycle is complete;
    - c. The presence of paper or optical media in the material charged to the incinerator, and its weight;
    - d. The cause or event that triggered the need to destroy paper or optical media in the incinerator;
    - e. The weight of paper or optical media charged to the incinerator, in pounds.
  - (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the incineration temperature within the primary, secondary and tertiary incineration chambers when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.
  - (3) Whenever the monitored average combustion temperature within any combustion 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/limit 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 readings 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.

The temperature range/limit is 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/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

- (4) The permittee shall maintain monthly records of the following information:
  - a. the incineration rate, in pounds, for each month; and
  - b. the rolling, 12-month summation of the incineration rates, in pounds.

- c. The rolling 12-month emissions rate for PE, NO<sub>x</sub>, SO<sub>2</sub>, CO and HCl, in tons;
- (5) 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Any days when the weight of material incinerated exceeds 350 pounds per hour;
  - b. Any months when the weight of material incinerated exceeded 2,000 pounds per month;
  - c. Any months when the weight of material incinerated exceeded 15,000 pounds per rolling 12-month period;
  - d. each period of time (start time and date, and end time and date) when the combustion temperature within any combustion chamber was less than the temperature limitations listed in c)(4);
  - e. each incident of deviation described in "d" (above) where a prompt investigation was not conducted;
  - f. each incident of deviation described in "d" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within

any combustion chamber above the acceptable limit, was determined to be necessary and was not taken; and

- g. each incident of deviation described in "d" where proper records were not maintained for the investigation and/or the corrective action(s).
- h. Any days when paper or optical media was incinerated;
- i. The circumstances that required the incineration of paper or optical media.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(2) The permittee shall submit semiannual written reports that identify:

- 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 minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) **Testing Requirements**

(1) Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

The PE from this emissions unit shall not exceed 0.35 pound per hour.

Applicable Compliance Method

Compliance shall be based on multiplying the emission factor of 2.0 pounds PE per ton material incinerated (stack test) multiplied by the maximum incineration rate of 0.175 ton per hour.

Compliance shall be based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(8) and U.S. EPA Reference Methods 1 through 5.

b. Emission Limitation

The PE from this emissions unit shall not exceed 0.0085 ton per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements of d)(4).

c. Emission Limitation

The NO<sub>x</sub> emissions from this emissions unit shall not exceed 0.55 pound per hour.

Applicable Compliance Method

Compliance shall be determined by multiplying the emission factor of 3.16 pounds NO<sub>x</sub> per ton of material incinerated (U.S. EPA, AP-42, 5th edition, 10/96, Section 2.1, Table 2.1-9) multiplied by the maximum incineration rate of 0.175 ton per hour.

If requested, compliance shall be based on the results of emission testing conducted in accordance with U.S. EPA Reference Methods 1 through 4 and 7.

d. Emission Limitation

The NO<sub>x</sub> emissions from this emissions unit shall not exceed 0.024 ton per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements of d)(4).

e. Emission Limitation

The SO<sub>2</sub> emissions from this emissions unit shall not exceed 0.56 pound per hour.

Applicable Compliance Method

Compliance shall be determined by multiplying the emission factor of 3.23 pounds SO<sub>2</sub> per ton of material incinerated (U.S. EPA, AP-42, 5th edition, 10/96, Section 2.1, Table 2.1-9) multiplied by the maximum incineration rate of 0.175 ton per hour.

If requested, compliance shall be based on the results of emission testing conducted in accordance with U.S. EPA Reference Methods 1 through 4 and 6.

f. Emission Limitation

The SO<sub>2</sub> emissions from this emissions unit shall not exceed 0.012 ton per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements of d)(4).

g. Emission Limitation

The CO emissions from this emissions unit shall not exceed 0.052 pound per hour.

Applicable Compliance Method

Compliance shall be determined by multiplying the emission factor of 0.299 pound CO per ton of material incinerated (U.S. EPA, AP-42, 5th edition, 10/96, Section 2.1, Table 2.1-9) multiplied by the maximum incineration rate of 0.175 ton per hour.

If requested, compliance shall be based on the results of emission testing conducted in accordance with U.S. EPA Reference Methods 1 through 4 and 10.

h. Emission Limitation

The CO emissions from this emissions unit shall not exceed 0.012 ton per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements of d)(4).

i. Emission Limitation

The HCl emissions from this emissions unit shall not exceed 1.78 pounds per hour.

Applicable Compliance Method

Compliance shall be determined by multiplying the emission factor of 10.2 pounds HCl per ton of material incinerated (mass balance according to EPA-670/2-73-049) multiplied by the maximum incineration rate of 0.175 ton per hour.

If requested, compliance shall be based on the results of emission testing conducted in accordance with U.S. EPA Reference Methods 1 through 4 and 26.

j. Emission Limitation

The HCl emissions from this emissions unit shall not exceed 0.039 ton per rolling 12-month period.

Applicable Compliance Method

Compliance shall be based on the record keeping requirements of d)(4).

k. Emission Limitation

Visible particulate emissions from the stack shall not exceed 5 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If requested, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with with OAC rule 3745-17-03(B)(1) and U.S. EPA Method 9.

- (2) 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 within 12 months after final issuance of this PTI.
  - b. The emission testing shall be conducted to demonstrate compliance with the PE mass emissions limitations and the HCl emissions limitation.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):  
  
U.S. EPA Reference Methods 1 through 5 and 26.  
  
Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. 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.
  - e. Not later than 60 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).
  - f. 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.
  - g. 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) The terms and conditions of this PTI supersede the terms and conditions of PTI 08-3694 issued May 14, 1997.