

Facility ID: 0243161213 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## **Part II - Specific Facility Terms and Conditions**

### **a State and Federally Enforceable Section**

1. None

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### **b State Only Enforceable Section**

1. The following insignificant emissions units are located at this facility:

P002-Mineral Spirits Still

Z001-Screw Machines (90)

Z002-Safety Kleen Degreaser

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0243161213 Emissions Unit ID: L002 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Enclosed design vapor degreaser, model #2AE-3D-SP for production parts cleaning. Control Combinations as required in the MACT standard, Option 4 (Freeboard Ratio, Superheated Vapor, Reduced Room Draft)	OAC 3745-21-09 (O)	Equivalent to or less stringent than the MACT
	40CFR Part 63, Subpart T	See Additional Terms and Conditions

**2. Additional Terms and Conditions**

- a. For the superheated vapor system, in accordance with 40 CFR 63.463 (e) (2) (vi), the permittee shall comply with the following requirements:
  - (a)
    - i. Ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 degrees F above the solvent's boiling point.
    - ii. Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed.
    - iii. Ensure that parts remain within the superheated vapor for at least the minimum proper dwell time.
  - b. The permittee shall maintain a freeboard with a freeboard ratio equal to 1.0 or greater.
  - c. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
    - i. Use of reduced room draft that ensures that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time measured using the procedure described in the "Monitoring and/or Recordkeeping Requirements" section of this permit. The permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.
    - ii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
    - iii. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
    - iv. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
    - v. The solvent cleaning machine shall have a primary condenser.

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**II. Operational Restrictions**

1. The permittee shall meet all of the following required work and operational practices:
  - a. The parts baskets or the parts being cleaned in solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.
  - b. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
  - c. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Northeast Office of the Ohio EPA or the Lake County Health Department.
  - d. Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.
  - e. During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.
  - f. During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
  - g. Whenever solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
  - h. The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Northeast District Office of the Ohio EPA or the Lake County Health Department to achieve the same or better results as those recommended by the manufacturer.
  - i. The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the Northeast District Office of the Ohio EPA or the Lake County Health Department.
  - j. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.
  - k. Sponges, fabric, wood, and paper products shall not be cleaned.
  - l. The cleaner shall be operated such that water cannot be visually detected in solvent exiting the water separator.
  - m. The permittee shall provide a permanent conspicuous label summarizing the operating procedures.

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall monitor the hoist speed as described below:
  - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
  - b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.
  - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
  - d. If the permittee can demonstrate to the satisfaction of the Director ( Northeast District Office of the Ohio EPA or the Lake County Health Department) in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
  - a. Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.
  - b. The date of installation for the solvent cleaning machine and all of its control devices.
  - c. Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.
3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:

- a. The results of control device monitoring required in this section of the permit.
  - b. Information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.
  - c. Estimates of annual organic compound consumption for the solvent cleaning machine.
4. Superheated vapor system
- The permittee shall conduct monitoring and record the results on a weekly basis for the superheated vapor system by using a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in the idling mode.
5. Reduced room draft
- The permittee shall conduct monthly monitoring tests of the wind speed within the enclosure using the procedures outlined in (5) (a) and (5)(b) below and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects.
- a. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located.
  - b. Record the maximum wind speed.

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**IV. Reporting Requirements**

1. The permittee shall submit an initial statement of compliance no later than 150 days after December 2, 1997 . Each initial statement of compliance shall contain the following:
  - a. The name and address of the permittee.
  - b. The address (i.e., physical location) of the solvent cleaning machine.
  - c. A list of the control equipment used to achieve compliance.
  - d. A list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date for each piece of control equipment required to be monitored.
  - e. Conditions to maintain the wind speed requirements as described in the "Additional Terms and Conditions" section of this permit.
2. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:
  - a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463 (d) (10)."
  - b. An estimate of solvent consumption during the reporting period.
3. The permittee shall submit an exceedance report on a semiannual basis.
 

If no operation conditions were established under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) and/or if the flow of air across the top of the freeboard area of the cleaning machine or within the solvent cleaning machine enclosure exceeded 15.2 meters per minute and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (Northeast District Office or Lake County Health Department.)

If the manufacturer's specification for determining the minimum dwell time within the superheated vapor system was not followed and/or parts did not remain within the vapor zone for at least the minimum proper dwell time and/or if the temperature of the solvent vapor at the center of the superheated vapor zone was less than 10 degrees Fahrenheit above the solvent's boiling point, and correction was not made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (Northeast District Office or Lake County Health Department.)
4. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (appropriate District Office or local air agency) does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
  - a. The reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

- b. If no exceedance has occurred, a statement to that effect shall be submitted.

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V. **Testing Requirements**

1. Calculating potential to emit for the facility

The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

- a. Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SAI_i$$

Where:

PTE<sub>i</sub> = the potential to emit for the solvent cleaning machine i (kilograms solvent per year).

H<sub>i</sub> = hours of operation for solvent cleaning machine i (hours per year).

= 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

W<sub>i</sub> = the working mode uncontrolled emission rate (kilograms per square meter per hour).  
= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

= 1.12 kilograms per square meter per hour for in-line cleaning machines.

SAI<sub>i</sub> = solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

- b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

$$SAI = 2.2 \times (Vol)^{0.6}$$

Where:

SAI = the solvent/air interface area (square meters).

Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).

- c. Sum the PTE<sub>i</sub> for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

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VI. **Miscellaneous Requirements**

1. A copy of this permit shall be posted in the near vicinity of this degreaser so that operators may have easy reference.

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Facility ID: 0243161213 Emissions Unit ID: L002 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall

not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Enclosed design vapor degreaser, model #2AE-3D-SP for production parts cleaning	OAC rule 3745-31-05 PTI 02-9031	See B.I.2.a and B.II.1
<b>2. Additional Terms and Conditions</b>		
a. The average hourly emission rate shall not exceed 21.35 lbs/hr of organic compounds based upon weekly solvent usage and weekly operating hours.		

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**II. Operational Restrictions**

1. The permittee shall limit the solvent usage to 1.92 gallons per hour and 16,848.65 gallons per year.

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each week for this emissions unit:
  - a. The name of each degreasing solvent utilized;
  - b. The number of gallons (Ls) and density (D) in pounds per gallon of each degreasing solvent utilized;
  - c. The number of gallons of each degreasing solvent sent off-site as waste (Lw);
  - d. The number of hours of operation per week (T);
  - e. The average hourly organic compound emission rate E(lbs/hr), which is calculated by the following equation:  
$$E = (Ls - Lw) \times D/T$$
  - f. The average hourly solvent usage (lbs/hr), on a weekly average. i.e., Ls/T; and
  - g. If more than one type of cleaning solvent is employed, the above equations shall be used for each cleaning solvent. The total organic compound emissions rate and total solvent usage rate shall be determined by the summations of the hourly organic compound emission rates and total hourly solvent usage rates for all cleaning solvents.
2. The permittee shall maintain records of the total annual degreasing solvent usage, in gallons, for this emissions unit.

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**IV. Reporting Requirements**

1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any weekly record showing the hourly organic compound emission rate or the hourly solvent usage limit exceeded the allowable limits. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days following the week of the occurrence.

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**V. Testing Requirements**

1. Compliance with the emission limitations and solvent usage limits in Section B.I. and B.II. of these terms and conditions shall be based on the record keeping as specified in Section B.III.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0243161213 Emissions Unit ID: P004 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Aluminum Parts Anodizing Line with Duellman Fume Wet Scrubber	OAC 3745-17-11(B)	1.62 pounds per hour particulate matter based on maximum process weight rate
	OAC 3745-17-07(A)	The visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by the rule

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The pH of the scrubber liquor shall be maintained within the range of 7.0 to 11.0.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than the flow rate prescribed in the manufacturer's specifications, in gallons per minute, at all times while the emissions unit is in operation.

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pH and the flow rate of the scrubber liquor while the emissions unit is in operation. The pH and the scrubber liquor flow rate monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the pH of the scrubber liquor, on a continuous basis;
- b. the flow rate of the scrubber liquor, in gallons per minute, on a continuous basis; and
- c. a log or record of operating time for the control device, monitoring equipment, and the associated emissions unit.

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**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH and/or flow rate did not comply with the requirements specified above.

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**V. Testing Requirements**

1. Compliance with the particulate matter emission limitation of 1.62 pounds per hour shall be determined in accordance with OAC rule 3745-17-03(B)(10). No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A). Such testing may be required at opacity levels less than those required by the visible emissions limit in Section A.I.

- 2. Visible Emission Limitation: 20% opacity

Applicable Compliance Method:

Compliance with OAC 3745-17-07(A) shall be demonstrated by the methods outlined in OAC 3745-17-03 (B)(3), if required by the Ohio EPA.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0243161213 Emissions Unit ID: P004 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

None

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Facility ID: 0243161213 Emissions Unit ID: P005 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Zinc Plating and Rinse Line with Viron Fume wet scrubber; Building # 4	OAC 3745-17-11(B) OAC 3745-17-07(A)	1.62 pounds per hour particulate matter based on maximum process weight rate The visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by the rule

2. Additional Terms and Conditions

- a. The scrubber is installed as a voluntary basis. There is no monitoring, record keeping or reporting requirements for this scrubber.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly 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 emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to 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.

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V. **Testing Requirements**

1. Compliance with the particulate matter emission limitation of 1.62 pounds per hour shall be determined in accordance with OAC rule 3745-17-03(B)(10). No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A). Such testing may be required at opacity levels less than those required by the visible emissions limit in Section A.I.
2. Visible Emission Limitation: 20% opacity  
 Applicable Compliance Method:  
 Compliance with OAC 3745-17-07(A) shall be demonstrated by the methods outlined in OAC 3745-17-03 (B)(3) if required by the Ohio EPA.

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VI. **Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None