Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

1/27/2011

| | |
|---|---|
| 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 |
| No | SYNTHETIC MINOR TO AVOID TITLE V |
| No | FEDERALLY ENFORCABLE PTIO (FEPTIO) |

ADAM LINK
NORCOLD, INC.
ONE CENTURY DRIVE
GETTYSBURG, OH 45328

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0819050198
Permit Number: P0107148
Permit Type: Renewal
County: Darke

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at 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 Josh Mandel," 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

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: RAPCA

Ohio | Environmental Protection Agency

# FINAL

# Division of Air Pollution Control
# Permit-to-Install and Operate
for
NORCOLD, INC.

| | |
|---|---|
| Facility ID: | 0819050198 |
| Permit Number: | P0107148 |
| Permit Type: | Renewal |
| Issued: | 1/27/2011 |
| Effective: | 1/27/2011 |
| Expiration: | 1/27/2021 |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Permit-to-Install and Operate**
for
NORCOLD, INC.

**Table of Contents**


Authorization ..... 1

A. Standard Terms and Conditions ..... 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? ..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them? ..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
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? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ..... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 5
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator? ..... 6
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 6
15. What happens if a portion of this permit is determined to be invalid? ..... 7

B. Facility-Wide Terms and Conditions ..... 8

C. Emissions Unit Terms and Conditions ..... 10

1. K001, Paint Dip Tank ..... 11
2. P003, Oxidation Oven/Ashing Unit ..... 16
3. Emissions Unit Group - Fin Press with Lubricating Oil: P005, P013, ..... 19

# Authorization

Facility ID: 0819050198
Application Number(s): A0039991
Permit Number: P0107148
Permit Description: Renewal PTIO which includes a paint dip tank, two fin press units which use evaporative lubricating oil and an oxidation oven.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 1/27/2011
Effective Date: 1/27/2011
Expiration Date: 1/27/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

NORCOLD, INC.
ONE CENTURY DRIVE
Gettysburg, OH 45328

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:

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

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

Scott J. Nally
Director

# Authorization (continued)

Permit Number: P0107148
Permit Description: Renewal PTIO which includes a paint dip tank, two fin press units which use evaporative lubricating oil and an oxidation oven.

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

| | |
|---|---|
| **Emissions Unit ID:** | **K001** |
| Company Equipment ID: | Paint Dip Tank |
| Superseded Permit Number: | 08-1583 |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P003** |
| Company Equipment ID: | Oxidation Oven/Ashing Unit |
| Superseded Permit Number: | 08-3914 |
| General Permit Category and Type: | Not Applicable |

**Group Name:** **Fin Press with Lubricating Oil**

| | |
|---|---|
| **Emissions Unit ID:** | **P005** |
| Company Equipment ID: | Fin Press No. 1 with lubricating oil |
| Superseded Permit Number: | 08-4082 |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P013** |
| Company Equipment ID: | Fin Press No. 2 with lubricating oil |
| Superseded Permit Number: | 08-4087 |
| 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 Regional Air Pollution Control Agency 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 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

[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).

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. K001, Paint Dip Tank

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

Paint Dip Tank

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. None.

(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. 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. | AOC rule 3745-31-05(A)(3) | Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 5.25 lbs/hr and 23.0 TPY.<br><br>The VOC content of the coatings applied in this emissions unit shall not exceed 2.3 lbs VOC/gal of coating excluding water and exempt solvents.<br><br>Compliance of this rule also includes compliance with the requirements of OAC rule 3745-21-09(U)(1)(i). |
| b. | OAC rule 3745-21-09(U)(1)(i) | The coating VOC content limitation specified by this rule is less stringent than the coating VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-11(C) | See b)(2)a. |

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-17-11(A)(1)(h), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(C), because it is a dip coating operation.

b. The hourly VOC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. the name and identification number of each coating, as applied; and

b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

$D_C$ = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

$V_S$ = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

$W_{VM}$ = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$ = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$ = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_{VM}$ = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_W$ = volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$ = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:

a. the number of gallons of each coating applied or the number of gallons of all coatings applied during the month;

b. the maximum VOC content (excluding water and exempt solvents) of each coating applied; or the maximum VOC content (excluding water and exempt solvents) for any coating applied, in pounds per gallon, as calculated for $C_{VOC,2}$ above;

c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(2)a. times d)(2)b. for all the individual coatings applied during the month; or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e., d)(2)a. times d)(2)b. for worst case coating;

d. the name and identification of each cleanup material employed;

e. the VOC content of each cleanup material, in pounds per gallon;

f. the number of gallons of each cleanup material employed;

g. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of d)(2)e. times d)(2)f. for all cleanup materials employed; and

h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of d)(2)c. and d)(2)g.

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(2) 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.

f) Testing Requirements

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

a. Emission Limitation

VOC emissions from this emissions unit shall not exceed 5.25 lbs/hr.

Applicable Compliance Method

Compliance with the hourly VOC emissions limit shall be determined by using the following equation from AP-42, Section 4.2.2.11-Large Appliance Surface Coating (1/95);

$$E = \frac{(6.234\ x\ 10^{-6})(P)(A)(t)(V_0)(D_0)}{(V_s)(T)} + (L_d)(D_d)$$

where:

E = mass of VOC emissions per unit time (lb/unit time)

P = units of production per unit time (units/hr)

A = area coated per unit of production ($ft^2$)

t = dry coating thickness (mils)

Vo = proportion of VOC in the coating (volume fraction), as received

Do = density of VOC solvent in the coating, as received (lb/gal)

Vs = proportion of solids in the coating (volume fraction), as received

T = transfer efficiency (See Table 4.2.2.11-1)

$L_d$= volume of VOC solvent added to the coating per unit time (gal/unit time)

$D_d$= density of VOC solvent added (lb/gal)

The constant 6.234 x 10-4 is the product of 2 conversion factors:

$$\frac{8.333\ x\ 10^{-5}\ ft}{mil}\ and\ \frac{7.481\ gal}{ft^3}$$

b. Emission Limitation

VOC emissions from this emissions unit shall not exceed 23.0 TPY.

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in d)(2).

c. Emission Limitation

The VOC content of the coatings applied in this emissions unit shall not exceed 2.3 lbs VOC/gal of coating excluding water and exempt solvents.

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in d)(1).

g) Miscellaneous Requirements

(1) None.

## 2. P003, Oxidation Oven/Ashing Unit

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

Oxidation Oven/Ashing Unit

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. None.

(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. 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) | Particulate emissions (PE) from this emissions unit shall not exceed 9.0 tons per year (TPY).<br><br>Visible emissions from this emissions unit shall not exceed 5% opacity as a six-minute average.<br><br>Compliance of this rule also includes compliance with the requirements of OAC rule 3745-17-09(B) and OAC rule 3745-17-07(A). |
| b. | OAC rule 3745-17-09(B) | PE from this emissions unit shall not exceed 0.10 lbs particulates per 100 lbs. of salvageable material charged. |
| | OAC rule 3745-17-07(A) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum amount of tubes oxidized per year for this emissions unit shall not exceed 18,000,000 pounds of tubes.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the pounds of tubes oxidized by this emissions unit.

(2) 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 identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) 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 minimize or eliminate the visible particulate emissions.

(2) 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.

f) Testing Requirements

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

a. Emission Limitation

PE from this emissions unit shall not exceed 9.0 TPY.

Applicable Compliance Method

Compliance with this emission limitation shall be determined by multiplying the annual material throughput of the emissions unit (18,000,000 pounds of salvageable material) times the allowable emission limit (0.10 pound particulates/100 pounds salvageable material charged), divided by 2000 lbs/ton.

b. Emission Limitation

PE from this emissions unit shall not exceed 0.10 pound particulates per 100 pounds 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).

c. 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

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

g) Miscellaneous Requirements

(1) None.

## 3. Emissions Unit Group - Fin Press with Lubricating Oil: P005, P013,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P005 | Fin Press No. 1 with lubricating oil |
| P013 | Fin Press No. 2 with lubricating oil |

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. None.

(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. 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) | Organic compound (OC) emissions from this emissions unit shall not exceed 51.84 lbs/day and 9.46 tons per year (TPY). |

(2) Additional Terms and Conditions

a. The daily OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for this emissions unit :

a. The name and identification number of the lubricating oil, as applied.

b. The OC content of the lubricating oil, as applied.

c. The number of gallons of each lubricating oil employed.

d. The total OC emissions from all lubricating oils employed, in pounds or tons (i.e. the number of gallons multiplied by the OC content).

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.

f) Testing Requirements

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

a. <u>Emission Limitation</u>

OC emissions from this emissions unit shall not exceed 51.84 lbs/day.

<u>Applicable Compliance Method</u>

Compliance with this emissions limitation shall be determined by multiplying the maximum daily usage (9.6 gallons/day) by the maximum allowable OC content of lubricating oil (5.4 lbs OC/ gallon).

b. <u>Emission Limitation</u>

OC emissions from this emissions unit shall not exceed 9.46 TPY.

<u>Applicable Compliance Method</u>

Compliance shall be determined with the recordkeeping specified in d)(1).

g) Miscellaneous Requirements

(1) None.