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

3/7/2012

Certified Mail

Facility ID: 0149000088
Permit Number: P0083765
County: Madison

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

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Madison Press. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
Ohio EPA-CDO

PUBLIC NOTICE
3/7/2012 Issuance of Draft Air Pollution Title V Permit

SHOWA Aluminum Corporation of America
10500 O'Day-Harrison Rd,
Mount Sterling, OH 43143-9474
Madison County
FACILITY DESC.: Motor Vehicle Air-Conditioning Manufacturing
PERMIT #: P0083765
PERMIT TYPE: Renewal
PERMIT DESC: Renewal Title V operating permit renewal for six emissions units used for manufactuing aluminum parts.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Benjamin Halton, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778

# Statement of Basis for Air Pollution Title V Permit

| | |
|---|---|
| Facility ID: | 0149000088 |
| Facility Name: | SHOWA Aluminum Corporation of America |
| Facility Description: | Aluminum Manufacturing |
| Facility Address: | 10500 O'Day-Harrison Rd, Mt. Sterling, OH 43143 |
| Permit #: | P0083767, Renewal |

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☒ Volatile Organic Compounds ☐ Nitrogen Oxides
☐ Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants
☐ Maximum Available Control Technology Standard(s)

**A. Standard Terms and Conditions**

| | |
|---|---|
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(V)? | Yes |
| Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them. | No |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1) | None |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3) | None |

| | |
|---|---|
| Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D) | None |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E) | Added pre-SB265 BAT emissions limitations and associated monitoring and/or recordkeeping, reporting, and testing requirements for emissions units (EUs) P035(P0104370) and P303(P0104397).<br><br>Added 'Air Services' reporting language for EUs P035(P0104370), P037(01-08247), P083(01-01311), and P303(P0104397).<br><br>Modified applicable rules table and additional terms and conditions section to reflect that the PE limitations established pursuant to OAC rule 3745-17-11 are less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) as effective 11/30/01 but become applicable when USEPA accepts the 12/1/06 version of OAC rule 3745-31-05(A)(3)(a)(ii) as part of the SIP for EUs P035(P0104370), P036(P0107341), and P305(P0107341).<br><br>Moved terms and conditions associated with the parametric monitoring requirements for the baghouse from the operational restrictions section to the monitoring and/or recordkeeping requirements section in accordance with the 'GE Decision' for EU P037(01-08247).<br><br>Updated the quarterly deviation reporting requirements for EU P037(01-08247).<br><br>Added 'Air Toxics' language to applicable rules table, moved terms from miscellaneous requirements section to monitoring and/or recordkeeping section, and identified these terms as state-only enforceable for EU P037(01-08247).<br><br>Moved 'Air Toxics' term from miscellaneous requirements section to monitoring and/or recordkeeping section for EU P083(01-01311).<br><br>Added monitoring/recordkeeping and reporting terms and conditions associated with the less than 10 gallons per day operational restriction for EU P083(01-01311).<br><br>Updated voluntary restrictions rule reference from OAC rule 3745-31-05(F) to OAC rule 3745-31-05(E) and identified these terms as state-only enforceable as required by rule for EUs P303(P0104397) and |

| | |
|---|---|
| | P304(P0106305).<br><br>Removed OAC rule 3745-21-07 restrictions/emission limitations from applicable rules table, additional terms and conditions section, monitoring and/or recordkeeping requirements section, reporting requirements section, and testing requirements section for EU P303(P0104397) because the effective rule does not apply to EU P303(P0104397).<br><br>Added monitoring, recordkeeping, and testing requirements terms associated with the annual catalyst activity test.<br><br>Added testing requirements term requiring testing within 6 months of permit expiration for EUs P303(P0104397) and P304(P0106305). |

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

| Term and Condition (paragraph) | Basis | | Comments |
|---|---|---|---|
| | SIP (3745- ) | Other | |
| None | | | |
| | | | |

**C. Emissions Unit Terms and Conditions**

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

| EU(s) | Limitation | Basis | | ND | OR | M | St | ENF | R | St | Rp | St | ET | Misc | Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | SIP (3745- ) | Other | | | | | | | | | | | | |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P035 | 0.19 lb/hr& 0.83 TPY PE | 31-05(A)(3) as effective 11/30/01 | NA | N | N | Y | N | N | Y | N | Y | N | N | N | Monitoring, recordkeeping, reporting and testing requirements associated with the operational parameters of the control equipment are sufficient to demonstrate continuous compliance with the emissions limitations. |
| P035 | NA | 31-05(A)(3)(a)(ii) as effective 12/01/06 | NA | Y | N | N | N | N | N | N | N | N | N | N | Includes template terms and conditions that clarify that BAT requirements will not apply to the PE from EU P035 pursuant to OAC rule 3745-31-05(A)(3)(a)(ii) when USEPA accepts the rule revisions as part of the SIP. |
| P035 | 20% opacity as a 6-minute average | 17-07(A)(1) | NA | N | N | Y | N | N | Y | N | Y | N | N | N | None. |
| P035 | NA | 17-08(A)(1) | NA | Y | N | N | N | N | N | N | N | N | N | N | None. |
| P035 | 0.94 lb/hr PE | 17-11(B)(1) | NA | N | N | N | N | N | N | N | N | N | N | N | Includes template terms and conditions that clarify that the PE limitation established by this rule becomes effective when the USEPA accepts the December 1, 2006 OAC rule 3745-31-05(A)(3)(a)(ii) rule revisions as part of the SIP.<br>Includes terms and conditions that identify that the PE limitation cannot be exceeded provided that emissions are venting to a properly operating baghouse and that the terms and conditions associated with the baghouse are sufficient to demonstrate compliance with the PE limitation. |
| P036 | 0.19 lb/hr& 0.83 TPY PE | 31-05(A)(3) as effective 11/30/01 | NA | N | Y | Y | N | N | Y | N | Y | N | N | N | Monitoring, recordkeeping, reporting and testing requirements associated with the operational parameters of the control equipment are sufficient to demonstrate continuous compliance with the emissions limitations. |
| P036 | NA | 31-05(A)(3)(a)(ii) as effective 12/01/06 | NA | Y | N | N | N | N | N | N | N | N | N | N | Includes template terms and conditions that clarify that BAT requirements will not apply to the PE from EU P035 pursuant to OAC rule 3745-31-05(A)(3)(a)(ii) when USEPA accepts the rule revisions as part of the SIP. |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P036 | 20% opacity as a 6-minute average | 17-07(A)(1) | NA | N | N | Y | N | N | Y | N | Y | N | N | N | None. |
| P036 | NA | 17-08(A)(1) | NA | Y | N | N | N | N | N | N | N | N | N | N | None. |
| P036 | 2.68 lbs/hr PE | 17-11(B)(1) | NA | N | Y | N | N | N | N | N | N | N | N | N | Includes template terms and conditions that clarify that the PE limitation established by this rule becomes effective when the USEPA accepts the December 1, 2006 OAC rule 3745-31-05(A)(3)(a)(ii) rule revisions as part of the SIP.<br>Includes terms and conditions that identify that the PE limitation cannot be exceeded provided that emissions are venting to a properly operating baghouse and that the terms and conditions associated with the baghouse are sufficient to demonstrate compliance with the PE limitation. |
| P037 | 0.5 lb/hr& 2.2 TPY PE | 31-05(A)(3) | NA | N | Y | Y | N | N | Y | Y | Y | N | N | N | Includes terms and conditions that identify that the PE limitation cannot be exceeded provided that emissions are venting to a properly operating baghouse and that the terms and conditions associated with the baghouse are sufficient to demonstrate compliance with the PE limitation.<br>Includes streamlining language that identifies quarterly reporting requirements for the parametric monitoring requirements associated with the control equipment. |
| P037 | NA | 17-11(B)(1) | NA | N | Y | Y | N | N | Y | N | Y | N | N | N | Includes terms and conditions that identify that the rule applies but that the limitations/restrictions are less stringent than the limitations/restrictions established pursuant to OAC rule 3745-31-05(A)(3). |
| P037 | 20% opacity as a 6-minute average | 17-07(A)(1) | NA | N | Y | Y | N | N | Y | N | Y | N | N | N | The requirements associated with the operation of the baghouse are sufficient to demonstrate compliance with this limitation. |
| P037 | NA | NA | ORC 3704.03(E) | N | N | Y | N | N | N | N | N | N | N | N | Includes terms and conditions in the monitoring and recordkeeping requirements related to the application of the Ohio Air Toxics policy. |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P083 | 2.54 lbs/hr& 11.1 TPY VOC | 31-05(A)(3) | NA | N | N | N | N | N | N | N | N | N | N | N | Includes terms and conditions that identify that the VOC emissions limitations have been established to reflect the potential to emit for EU P083. |
| P083 | <10 gal per day oil usage | 21-09(U)(2)(e) | NA | N | N | Y | Y | N | Y | Y | Y | N | N | N | Includes streamlining language for monitoring and/or recordkeeping requirements associated with the <10 gal/day oil usage restriction. |
| P083 | NA | NA | ORC 3704.03(E) | N | N | Y | N | N | N | N | N | N | N | N | Includes terms and conditions in the monitoring and recordkeeping requirements related to the application of the Ohio Air Toxics policy. |
| P303 | 1.46 lbs/hr OC<br><br>Natural Gas emissions limitations:<br>0.03 TPY PE<br>0.37 TPY CO<br>0.003 TPY $SO_2$<br>0.44 TPY $NO_X$<br>0.02 TPY VOC | 31-05(A)(3) as effective 11/30/01 | NA | N<br><br>N | N<br><br>N | Y<br><br>N | N<br><br>N | N<br><br>N | Y<br><br>N | N<br><br>N | Y<br><br>N | N<br><br>N | N<br><br>N | N<br><br>N | Monitoring, recordkeeping, reporting and testing requirements associated with the operational parameters of the control equipment are sufficient to demonstrate continuous compliance with the emissions limitations.<br><br>Includes terms and conditions that identify that the emissions limitations established for the combustion of natural gas in the catalytic incinerator have been established to reflect the potential to emit. |
| P303 | NA | 31-05(A)(3)(a)(ii) as effective 12/01/06 | NA | N | N | N | N | N | N | N | N | N | N | N | Includes template terms and conditions that clarify that BAT requirements will not apply to the OC emissions from EU P303 or the emissions related to the combustion of natural gas in the catalytic incinerator pursuant to OAC rule 3745-31-05(A)(3)(a)(ii) when USEPA accepts the rule revisions as part of the SIP. |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P303 | 6.39 TPY OC<br><br>85% OC reduction | 31-05(E) | NA | N<br><br>N | N<br><br>N | Y<br><br>Y | N<br><br>Y | N<br><br>N | Y<br><br>Y | N<br><br>Y | Y<br><br>Y | N<br><br>N | Y<br><br>Y | N<br><br>N | Includes additional terms and conditions identifying that the facility has accepted voluntary restrictions for the purpose of avoiding OAC rule 3745-31-05(A)(3)(a)(ii) when USEPA accepts the rule revisions as part of the SIP.<br><br>Includes streamlining terms in the monitoring, recordkeeping, and testing requirements sections associated with the annual catalyst activity test.<br><br>Monitoring, recordkeeping, reporting and testing requirements associated with the operational parameters of the control equipment are sufficient to demonstrate continuous compliance with the control efficiency requirement. |
| P304 | 0.49 lbs/hr& 2.16 TPY OC<br><br>Natural Gas emissions limitations:<br>0.08 lb/hr& 0.03 TPY PE<br>0.084 lb/hr& 0.37 TPY CO<br>0.0006 lb/hr& 0.003 TPY $SO_2$<br>0.10 lb/hr& 0.44 TPY $NO_X$<br>0.006 lb/hr& 0.02 TPY OC | 31-05(A)(3) as effective 11/30/01 | NA | N<br><br>N | Y<br><br>N | Y<br><br>N | N<br><br>N | N<br><br>N | Y<br><br>N | N<br><br>N | Y<br><br>N | N<br><br>N | N<br><br>N | N<br><br>N | Monitoring, recordkeeping, reporting and testing requirements associated with the operational parameters of the control equipment are sufficient to demonstrate continuous compliance with the emissions limitations.<br><br>Includes terms and conditions that identify that the emissions limitations established for the combustion of natural gas in the catalytic incinerator have been established to reflect the potential to emit. |
| P304 | NA | 31-05(A)(3)(a)(ii) as effective 12/01/06 | NA | N | N | N | N | N | N | N | N | N | N | N | Includes template terms and conditions that clarify that BAT requirements will not apply to the OC emissions from EU P304 or the emissions related to the combustion of natural gas in the catalytic incinerator pursuant to OAC rule 3745-31-05(A)(3)(a)(ii) when USEPA accepts the rule revisions as part of the SIP. |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P304 | 95% minimum DRE | 31-05(E) | NA | N | Y | Y | Y | N | Y | Y | Y | N | Y | N | Includes additional terms and conditions identifying that the facility has accepted voluntary restrictions for the purpose of avoiding OAC rule 3745-31-05(A)(3)(a)(ii) when USEPA accepts the rule revisions as part of the SIP.<br><br>Includes streamlining terms in the monitoring, recordkeeping, and testing requirements sections associated with the annual catalyst activity test.<br><br>Monitoring, recordkeeping, reporting and testing requirements associated with the operational parameters of the control equipment are sufficient to demonstrate continuous compliance with the destruction efficiency requirement. |
| P305 | 0.10 lb/hr& 0.44 TPY PE | 31-05(A)(3) as effective 11/30/01 | NA | N | Y | Y | N | N | Y | N | Y | N | N | N | Monitoring, recordkeeping, reporting and testing requirements associated with the operational parameters of the control equipment are sufficient to demonstrate continuous compliance with the emissions limitations. |
| P305 | NA | 31-05(A)(3)(a)(ii) as effective 12/01/06 | NA | Y | N | N | N | N | N | N | N | N | N | N | Includes template terms and conditions that clarify that BAT requirements will not apply to the PE from EU P035 pursuant to OAC rule 3745-31-05(A)(3)(a)(ii) when USEPA accepts the rule revisions as part of the SIP. |
| P305 | 20% opacity as a 6-minute average | 17-07(A)(1) | NA | N | N | Y | N | N | Y | N | Y | N | N | N | None. |
| P305 | NA | 17-08(A)(1) | NA | Y | N | N | N | N | N | N | N | N | N | N | None. |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P305 | 0.44 lb/hr, 10.56 lbs/day & 1.90 TPY OC | 17-11(B)(1) | NA | N | Y | N | N | N | N | N | N | N | N | N | Includes template terms and conditions that clarify that the PE limitation established by this rule becomes effective when the USEPA accepts the December 1, 2006 OAC rule 3745-31-05(A)(3)(a)(ii) rule revisions as part of the SIP.<br>Includes terms and conditions that identify that the PE limitation cannot be exceeded provided that emissions are venting to a properly operating cyclone and that the terms and conditions associated with the cyclone are sufficient to demonstrate compliance with the PE limitation. |

Ohio | Environmental Protection Agency

# DRAFT

# Division of Air Pollution Control
# Title V Permit
for
SHOWA Aluminum Corporation of America

| | |
|---|---|
| Facility ID: | 0149000088 |
| Permit Number: | P0083765 |
| Permit Type: | Renewal |
| Issued: | 3/7/2012 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
SHOWA Aluminum Corporation of America

**Table of Contents**


Authorization ..... 1
A. Standard Terms and Conditions ..... 2
1. Federally Enforceable Standard Terms and Conditions ..... 3
2. Monitoring and Related Record Keeping and Reporting Requirements ..... 3
3. Scheduled Maintenance ..... 6
4. Risk Management Plans ..... 6
5. Title IV Provisions ..... 7
6. Severability Clause ..... 7
7. General Requirements ..... 7
8. Fees ..... 8
9. Marketable Permit Programs ..... 8
10. Reasonably Anticipated Operating Scenarios ..... 8
11. Reopening for Cause ..... 9
12. Federal and State Enforceability ..... 9
13. Compliance Requirements ..... 9
14. Permit Shield ..... 11
15. Operational Flexibility ..... 11
16. Emergencies ..... 11
17. Off-Permit Changes ..... 11
18. Compliance Method Requirements ..... 12
19. Insignificant Activities or Emissions Levels ..... 12
20. Permit to Install Requirement ..... 12
21. Air Pollution Nuisance ..... 13
22. Permanent Shutdown of an Emissions Unit ..... 13
23. Title VI Provisions ..... 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only ..... 14
25. Records Retention Requirements Under State Law Only ..... 14
26. Inspections and Information Requests ..... 14
27. Scheduled Maintenance/Malfunction Reporting ..... 15
28. Permit Transfers ..... 15

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

B. Facility-Wide Terms and Conditions ..... 16

C. Emissions Unit Terms and Conditions ..... 18

1. P035, ED Cut off process ..... 19
2. P036, Extrusion cut-off process ..... 26
3. P037, Zinc Deposition Process ..... 31
4. P083, Extrusion oiler ..... 37
5. P303, Roller Leveler ..... 40
6. P304, Chip sprayer ..... 49
7. P305, Billet side cut ..... 59

# Authorization

| | |
|---|---|
| Facility ID: | 0149000088 |
| Facility Description: | Aluminum manufacturing |
| Application Number(s): | A0014167, A0014172, A0041154, A0014169, A0039532, A0014173, A0014170, A0040089, A0014168, A0014171 |
| Permit Number: | P0083765 |
| Permit Description: | Renewal Title V operating permit renewal for six emissions units used for manufactuing aluminum parts. |
| Permit Type: | Renewal |
| Issue Date: | 3/7/2012 |
| Effective Date: | To be entered upon final issuance |
| Expiration Date: | To be entered upon final issuance |

Superseded Permit Number: P0083764

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

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

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Central District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# 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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

## *2.* 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

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 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Central District Office.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. Severability Clause**

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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b) 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 paragraph (E) of OAC rule 3745-77-03.

(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.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**25. Records Retention RequirementsUnder State Law Only**

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.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

# 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. P035, ED Cut off process**

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

ED Chamfering Process for the Cutting of Extruded Tubes for Copier Toner Cartridges, with Baghouse

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), as effective 11/30/01 | Particulate emissions (PE) shall not exceed 0.19 pound per hour (lb/hr) and 0.83 ton per year (TPY).<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06<br><br>(P0104370) | See b)(2)b. |
| c. | OAC rule 3745-17-07(A)(1) | Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. |
| d. | OAC rule 3745-17-08(A)(1) | See b)(2)c. below. |
| e. | OAC rule 3745-17-11(B)(1) | The PE limitation established by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/01.<br><br>See b)(2)b.ii. |

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265

changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

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

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the calculated annual emission rate for PE is less than 10 tons/year, taking into account the federally enforceable rule limit of 0.94 lb/hr under OAC rule 3745-17-11(B)(1); and

ii. PE shall not exceed 0.94 lb/hr, based on Table I. See b)(2)d., b)(2)e., and b)(2)f.

c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.

e. The hourly PE limitation for this emissions unit is greater than the potential to emit as vented to a baghouse. Therefore, to ensure compliance with this limit it is only necessary to develop monitoring and/or recordkeeping and reporting requirements that demonstrate that the particulate emissions from this emissions unit are vented to a properly operating baghouse.

f. The emissions from this emissions unit shall be vented to a baghouse at all times when the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis:

a. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between **1.0** to **5.0** inches of water.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range 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 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 pressure drop 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) This range or limit on the pressure drop across the baghouse 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 limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of anadministrative modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

(3) 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.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

PE shall not exceed 0.19 lb/hr and 0.83 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

If required, compliance with the hourly PE limitation shall be demonstrated according to 40 CFR Part 60, Appendix A, method 5.

The annual PE limitation was established by multiplying the hourly PE limitation by the maximum number of hours in a year (8,760) and dividing by 2,000 pounds per ton. It is not necessary to demonstrate compliance with the annual limitation as long as compliance with the hourly limitation is demonstrated.

b. Emissions Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emissions Limitation:

PE shall not exceed 0.94 lb/hr.

Applicable Compliance Method:

The controlled potential to emit for PE was established by multiplying the maximum number of tubes processed per hour (2,740) by the emission factor provided in the PTI application (0.000602 lb PE/tube) and accounting for captureefficiency (90%) and control efficiency (99%) using the following calculations:

hourly potential PE = hourly potential stack PE + hourly potential fugitive PE

where,

hourly potential stack PE = maximum number of tubes processed per hour * emission factor * (captureefficiency) * (1 - control efficiency); and

hourly potential fugitive PE = maximum number of tubes processed per hour * emission factor * (1 - capture efficiency)

If required, compliance with the hourly PE limitation shall be demonstrated according to 40 CFR Part 60, Appendix A, method 5.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**2. P036, Extrusion cut-off process**

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

Extrusion cut-off process

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), as effective 11/30/01<br><br>(P0107341) | Particulate emissions (PE) shall not exceed 0.19 pound per hour (lb/hr) and 0.83 ton per year (TPY).<br><br>See b)(2)a., b)(2)b., and b)(2)d. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06<br><br>(P0107341) | See b)(2)c. |
| c. | OAC rule 3745-17-07(A)(1) | Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. |
| d. | OAC rule 3745-17-08(A)(1) | See b)(2)e. |
| e. | OAC rule 3745-17-11(B)(1) | The PE limitation established by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/01.<br><br>See b)(2)c.ii. |

(2) Additional Terms and Conditions

a. Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a baghouse. BAT also includes compliance with the terms and conditions of this permit. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

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

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE for this emissions unitbecause the controlled potential to emit for PE is less than ten tons per year; and

ii. PE shall not exceed 2.68 lbs/hr, based on Table I. See b)(2)f. and b)(2)g.

d. The hourly PE limitation was established to reflect the potential-to-emit for thisemissions unit as vented to a baghouse and in accordance with the information provided in the PTI application. The operational restrictions, monitoring and/or recordkeeping, reporting and testing requirements that ensure that PE from this emissions unit are directed to the baghouse are sufficient to ensure compliance with this limitation.

e. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

f. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.

g. The hourly PE limitation established for this emissions unit in accordance with Table I of OAC rule 3745-17-11 is greater than the potential to emit. It is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) The permittee shall operate the baghouse for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the baghouse in

accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term:OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the control equipment:

a. a log of the downtime for the control device when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the baghouse, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

a. a log of the downtime for the control device when the associated emissions unit was in operation;

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

c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitation:</u>

Particulate emissions shall not exceed 0.19 lb/hr and 0.83 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The hourly emissions limitation was established by multiplying the maximum pounds of aluminum processed per hour (1,060) by the emission factor provided in the PTI application (0.00164 lb PE/lb aluminum) and accounting for capture and control efficiency using the following calculations:

PE emissions/hr = [(maximum pounds of aluminum processed) x (emissions factor) x (Cap) x (1-CE)] + [(maximum pounds of aluminum processed) x (emissions factor) x (1-Cap)]

where,

Cap= capture efficiency (90%)

CE= control efficiency (99%)

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

If required, the permittee shall demonstrate compliance with the hourly emissions limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

b. Emissions Limitation:

Particulate emissions shall not exceed 2.68lbs/hr.

Applicable Compliance Method:

The hourly emissions limitation was established in accordance with Table I of OAC rule 3745-17-11. The uncontrolled potential to emit for this emissions unit is calculated to be 1.74 lbs PE/hrestablished by multiplying the maximum pounds of aluminum processed per hour (1060) by the emission factor provided in the PTI application (0.00164 lb PE/lb aluminum).

c. Emissions Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**3. P037, Zinc Deposition Process**

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

Zinc Deposition Operation for Extruded Aluminum Tubes, with Baghouse

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) b)(1)d. and d)(3) through d)(5)

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)<br><br>(01-08247) | Particulate emissions (PE) from thisemissions unit shall not exceed 0.5 pound per hour (lb/hr) and 2.2 tons per year (TPY).<br><br>The requirements of this rule also includecompliance with the requirements of 3745-17-07(A)(1).<br><br>See b)(2)a. and c)(1) |
| b. | OAC rule 3745-17-11(B)(1) | The PE limitation established by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions shall notexceed 20% opacity as a six-minuteaverage, except as provided by rule. |
| d. | ORC 3704.03(F) | See d)(3) through d)(5) |

(2) Additional Terms and Conditions

a. The pound per hour PE limit reflects the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limit.

c) Operational Restrictions

(1) The facility shall employ a baghouse/fabric filter to control particulate emissions from this emissions unit whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the final cartridge filter, while the emissions unit is in operation. The monitoring equipment shallbe calibrated, operated, and maintained in accordance with the manufacturer's recommendations,instructions, and operating manual(s). The permittee shall record the pressure drop across the final cartridge filter on a daily basis while the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The pressure drop across the fabric filter shall be maintained within the range of 2 to 4 inches of water while the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permit to install application for this/these emissions unit(s), P037, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

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

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for

Chemical Substances and Physical Agents Biological Exposure Indices"; or

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

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

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

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

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Zinc oxide (dust)

TLV (mg/m3): 10

Maximum Hourly Emission Rate (lbs/hr): 0.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 213.3

MAGLC (ug/m3): 238.1

The permittee, having demonstrated that emissions of Zinc oxide (dust), from emissions unit(s) P037, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)]

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

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "Toxic Air Contaminant Statute", ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)]

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

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

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the range specified by this permit and outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitation:</u>

PEshall not exceed 0.5 lb/hrand 2.2 TPY.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

If testing is not required, compliance with this emissions limitation shall be determined by usingthe following calculations as provided by the facility:

Maximum amount of PE created = 0.105 lb PE per kg of aluminum extruded
Maximum amount of aluminum extruded per hour = 479 kg per hour
Capture efficiency of system is 100%
Control efficiency of baghouse dust collector is 99%
(479 kg aluminum/hr) x (0.105 lb PM/kg aluminum) x (1 - 0.99) = 0.5 lb PE/hr

Annual PE emissions: (0.5 lb PE/hr) x (8760 hours/year) x (1 ton/2000 lbs) = 2.2 tons PE/year.

b. Emissions Limitation:

Visible particulate emissions shall notexceed 20% opacity as a six-minuteaverage, except as provided by rule.

Applicable Compliance Method:

For the purpose of determining compliance with paragraph (A)(1) of rule 3745-17-07 of the Ohio Administrative Code, visible particulate emissions shall be determined according to OAC rule 3745-17-03 (B)(1).

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**4. P083, Extrusion oiler**

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

Extrusion Oiler

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)<br><br>(01-01311) | Volatile organic compound (VOC) emissions shall not exceed 2.54 pounds per hour (lbs/hr) and 11.1 tons per year (TPY). |
| b. | OAC rule 3745-21-09(U)(2)(e) | Oil usage shall not exceed 10 gallons per day. |
| c. | ORC 3704.03(F) | See d)(2) |

(2) Additional Terms and Conditions

a. The short-term and annual emissions limitations were established to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping and/or reporting requirements to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each coating employed;

b. the number of gallons of each coating employed; and

c. the total number of gallons of all the coatings employed.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC 3745-21-09(B)(3)(d)]

(2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviations reports that identify each day the coating usage rate exceeded 10 gallons per day, the number of gallons applied on each such day, and the reason for the/each exceedance.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the Standard Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitations:</u>

VOC emissions shall not exceed 2.54 lbs/hr and 11.1 TPY.

<u>Applicable Compliance Method:</u>

Compliance with the hourly emissions limitation shall be determined by usingthe following calculations as provided by the facility:

Research showed 60.95 pounds of oil used on a day when 11,500 kg of tubing were coated with oil.

(60.95 lbs oil/ 11,500 kg tubing) = 0.0053 lb oil/kg tubing
Maximum tubing per day is 11,500 kg
(0.0053 lb oil / kg tubing)(11,500 kg tubing/day) = 60.95 lbs oil/day / 24 hours = 2.54 lbs oil/hour

Compliance with the annual VOC emission limitation is ensured if compliance is maintained with the hourly VOC emission limitation. The annual VOC emission limitation was determined by multiplying the hourly VOC emission limitation by 8,760 hours/year and dividing by 2,000 lbs/ton.

b. Emissions Limitation:

Oil usage shall not exceed 10 gallons per day.

Applicable Compliance Method:

Compliance with this restriction shall be demonstrated through recordkeeping requirements established in d)(1).

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**5. P303, Roller Leveler**

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

Roller Leveler vented to a catalytic incinerator

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

(1) b)(1)b., b)(2)d.ii., c)(1), d)(1) through d)(5), e)(2), f)(1)c., f)(2), and f)(3)

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), as effective 11/30/01 | Organic compound (OC) emissions shall not exceed 1.46 pounds per hour (lbs/hr).<br><br>The following limitations apply to the combustion of natural gas in the catalytic incinerator serving this emissions unit:<br><br>Particulate emissions (PE) shall not exceed 0.03 ton per year (TPY);<br><br>Carbon monoxide (CO) emissions shall not exceed 0.37 TPY;<br><br>Sulfur dioxide ($SO_2$) emissions shall not exceed 0.003 TPY;<br><br>Nitrogen oxides ($NO_X$) emissions shall not exceed 0.44 TPY; and<br><br>Volatile organic compound (VOC) emissions shall not exceed 0.02 TPY.<br><br>See b)(2)a., b)(2)b., and b)(2)c. |
| b. | OAC rule 3745-31-05(E)<br><br>(P0104397) | See b)(2)d.ii. |
| c. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 | See b)(2)d.i |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | (P0104397) | |

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourlyOC limitation for this emissions unit was established to reflect the controlled potential to emit.Therefore, it is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with this limitation.

c. The annual PE, CO, $SO_2$, $NO_X$ and VOC emissions limitations were established to reflect the potential to emit from the combustion of natural gas in the catalytic incinerator serving this emissions unit. Therefore, it is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

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

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the PE, CO, $SO_2$, $NO_X$ and VOC emissions related to the combustion of natural gas in the catalytic incinerator serving this emissions unitbecause the potential to emit for each of these pollutants is less than ten tons per year (TPY); and

ii. Permit to Install P0104397 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A(3):

(a) Organic Compound (OC) emissions shall not exceed 6.39 TPY;

(b) OC emissions from this emissions unit shall be reduced overall by a minimum of 85%; and

(c) The annualOC limitation for this emissions unit was established to reflect the controlled potential to emit.Therefore, it is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst, as determined in an annual catalyst activity test, shall be sufficient to meet the destruction efficiency and control efficiency requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

[Authority for term:OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable temperature of the exhaust gases immediately before the catalyst bed, during any period of time when the emissions unit(s) controlled by the catalytic incinerator is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. The acceptable temperature difference across the catalyst bed (when the emissions unit(s) is/are in operation), shall not be less than 80 percent of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.Until compliance testing has been conducted, the catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(E)]

(2) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The continuous monitoring and recording devices shall be capable of accurately measuring the desired parameter and the owner or operator shall properly operate and maintain the devices in accordance with the manufacturer's recommendations. The acceptable temperature settings shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(E)]

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature of the exhaust gases immediately before the catalyst and the average temperature difference across the catalyst bed immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(E)]

(4) The temperature ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range(s) based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s)of the controlled pollutant(s). In addition, approved revisions to the temperature range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a an administrative modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(E)]

(5) The permittee shall perform a preventative maintenance inspection of the catalytic incinerator on an annual basis to evaluate the performance of the catalyst bed. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. During each annual inspection a sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test. The permittee shall maintain a record of the results of each annual inspection and the results of each annual catalyst activity test.

The permittee shall also perform weekly inspections of the external integrity of the catalytic incinerator. Records shall be maintained of the inspections and the date(s) of catalyst replacement, and if only partial, the amount or percent of the total catalyst replaced.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date)when the average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed was outside of the ranges specified by the manufacturer and/or outside of the acceptable ranges following any required compliance demonstration;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the catalytic incinerator;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a”or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed into compliance with the acceptable range(s), was determined to be necessary and was not taken; and

e. each incident of deviation described in “a”or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the Standard Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), and OAC rule 3745-31-05(E)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitation:</u>

OC emissions shall not exceed 1.46 lbs/hr(as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The controlled hourly potentialto emit for OC was established by multiplying the maximum amount of solvent used per hour (1.5 gallons) by the OC content of the solvent (6.70 lbs/gal)and accounting for captureefficiency (90%) and destruction efficiency (95%) using the following calculations:

hourly potential OC = hourly potential stack OC + hourly potential fugitive OC

where,

hourly potential stack OC = [maximum amount of solvent used per hour * OC content * (captureefficiency) * (1 - control efficiency)]; and

hourly potential fugitive OC = [maximum amount of solvent used per hour * OC content * (1 - capture efficiency)]\

b. Emissions Limitation:

The following limitations apply to the combustion of natural gas in the catalytic incinerator serving this emissions unit (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP):

PE shall not exceed 0.03 TPY;
CO emissions shall not exceed 0.37 TPY;
$SO_2$ emissions shall not exceed 0.003 TPY;
$NO_X$ emissions shall not exceed 0.44 TPY; and
VOC emissions shall not exceed 0.02 TPY.

Applicable Compliance Method:

The annual emissions limitations were calculated using the maximum annual natural gas usage [8.76 million cubic feet per year (MMcf/yr)] and the following AP-42 emissions factors for each pollutant:

| Pollutant | Emissions Factor# |
|---|---|
| PE | 7.6 lb PE/MMcf |
| CO | 84 lb CO/MMcf |
| $SO_2$ | 0.6 lb $SO_2$/MMcf |
| $NO_X$ | 100 lb$NO_x$/MMcf |
| VOC | 5.5 lb OC/MMcf |

# AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Table 1.4-1 and 1.4-2, July 1998.

c. Emissions Limitation:

OC emissions shall not exceed 6.39 TPY.

Applicable Compliance Method:

The controlled potential to emit for OC was established by multiplying the maximum amount of solvent used per year (13,140 gallons) by the OC content of the solvent (6.70 lbs/gal)and accounting for captureefficiency (90%) and destruction efficiency (95%) and converting into tons using the following calculations:

annual potential OC = annual potential stack OC + annual potential fugitive OC

where,

annual potential stack OC = [maximum amount of solvent used per year * OC content * (captureefficiency) * (1 - control efficiency)]/2000; and

annual potential fugitive OC = [maximum amount of solvent used per year * OC content * (1 - capture efficiency)]/2000

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(E)]

(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 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the requirement to reduce overall OC emissions by 85%;

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 18, Method 25 or Method 25A of 40 CFR Part 60, Appendix A.

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

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 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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; and

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.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-04(A) and OAC rule 3745-31-05(E)]

(3) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in this permit. An intent to test notification shall not be required for catalyst activity testing. The procedures for the catalyst activity test shall be conducted in accordance with the manufacturer's recommendations and as required by the appropriate test method.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**6. P304, Chip sprayer**

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

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

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

(1) b)(1)b., b)(2)d.ii., c)(1), c)(2), d)(1) through d)(6), e)(2), f)(2), and f)(3)

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), as effective 11/30/01<br><br>(P0106305) | Volatile organic compound (VOC) emissions from the conveyorized degreaser shall not exceed 0.49 pound per hour (lb/hr) and 2.16 tons per year (TPY). See b)(2)a.<br><br>Emissions from the combustion of natural gas in the catalytic incinerator serving this emissions unit shall not exceed the following:<br><br>Nitrogen oxides ($NO_X$) emissions shall not exceed 0.10 lb/hr and 0.44 TPY;<br><br>Particulate emissions (PE) shall not exceed 0.008 lb/hr and 0.03 TPY;<br><br>Sulfur dioxide ($SO_2$) emissions shall not exceed 0.0006 lb/hr and 0.003 TPY;<br><br>Carbon monoxide (CO) emissions shall not exceed 0.084 lb/hr and 0.37 TPY; and<br><br>OC emissions shall not exceed 0.006 lb/hr and 0.02 TPY.<br><br>See b)(2)a., b)(2)b. and b)(2)c. |
| b. | OAC rule 3745-31-05(E) | See b)(2)d.ii. and c)(1) |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | (P0106305) | |
| c. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06<br><br>(P0106305) | See b)(2)d.i |
| d. | OAC rule 3745-21-09(O)(4) | The emissions limitations and operational restrictions specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(E). |

(2) Additional Terms and Conditions

a. The permittee has satisfied the best available technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC emissions limitation was established to reflect the potential-to-emit for the conveyorized degreaser as vented to a catalytic incinerator through the use of a permanent total enclosure and in accordance with the information provided in the PTI application. The monitoring and/or recordkeeping, reporting and testing requirements that ensure that VOC emissions from this emissions unit are captured and directed to the catalytic incinerator are sufficient to ensure compliance with this limit.

c. The PE, CO, $SO_2$, $NO_X$ and OC limitations were established to reflect the potential-to-emit for each pollutant related to the combustion of natural gas in the catalytic incinerator in accordance with the information provided in the PTI application. It is not necessary to establish monitoring and recordkeeping or reporting requirements to ensure compliance with these limitations.

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

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this emissions unit or the PE, CO, $SO_2$, $NO_X$and

OC emissions related to the combustion of natural gas in the catalytic incinerator serving this emissions unitbecause the potential to emit for each of these pollutants is less than ten tons per year; and

ii. Permit to Install P0106305 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A(3):

(a) the use of a permanent total enclosure venting to a catalytic incinerator with a minimum destruction efficiency of 95%:

(b) workplace fans shall not be placed near the conveyorized degreaser openings;

(c) the conveyorized degreaser shall be operated in a manner to prevent cleaned parts from carrying out solvent liquid or vapor including racking parts so that solvent drains freely from parts and is not trapped;

(d) downtime covers shall be placed over entrances and exits of the conveyorized degreaser at all times when the conveyors and exhausts are not being operated;

(e) waste solvent shall be stored in covered containers;

(f) solvent leaks shall be repaired immediately, or the conveyorizeddegreaser shall be shut down; and

(g) porous and/or absorbent materials shall not be cleaned in the conveyorized degreaser.

c) Operational Restrictions

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

[Authority for term:OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(E)]

(2) The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst, as determined in an annual catalyst activity test, shall be sufficient to meet the destruction efficiency and control efficiency requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory’s normal testing protocol.

[Authority for term:OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

a. the types of solvents employed in the conveyorized degreaser; including the chemical name(s), solvent concentration and/or VOC content;

b. the total solvent added to the conveyorized degreaser or the amount purchased for use in the emissions unit;

c. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year;

d. the difference between the solvent used or purchased and the used solvent shipped offsite;

e. the date and amount of time any cover, for closing off the entrance and exit, was removed or left open when the conveyorized degreaser was not in use, except during maintenance activities;

f. the date and a detailed description of any maintenance performed on the catalytic incinerator; and

g. any period of time (start time and date, and end time and date)during which the conveyorized degreaser was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC 3745-21-09(B)(3)(d) and OAC rule 3745-31-05(E)]

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable temperature of the exhaust gases immediately before the catalyst bed, during any period of time when the emissions unit(s) controlled by the catalytic incinerator is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. The acceptable temperature difference across the catalyst bed (when the emissions unit(s) is/are in operation), shall not be less than 80 percent of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(E)]

(3) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The continuous monitoring and recording devices shall be capable of accurately measuring the desired parameter and the owner or operator shall properly operate and maintain the devices in accordance with the manufacturer's recommendations. The acceptable temperature settings shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(E)]

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature of the exhaust gases immediately before the catalyst and the average temperature difference across the catalyst bed immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(E)]

(5) The temperature ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range(s) based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) of the controlled pollutant(s). In addition, approved revisions to the temperature range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a an administrative modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(E)]

(6) The permittee shall perform a preventative maintenance inspection of the catalytic incinerator on an annual basis to evaluate the performance of the catalyst bed. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. During each annual inspection a sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test. The permittee shall maintain a record of the results of each annual inspection and the results of each annual catalyst activity test.

The permittee shall also perform weekly inspections of the external integrity of the catalytic incinerator. Records shall be maintained of the inspections and the date(s) of catalyst replacement, and if only partial, the amount or percent of the total catalyst replaced.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed was outside of the ranges specified by the manufacturer and/or outside of the acceptable ranges following any required compliance demonstration;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the catalytic incinerator;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed into compliance with the acceptable range(s), was determined to be necessary and was not taken;

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s);

f. any period of time during which any cover, for closing off the entrance and exit, was removed or left open when the conveyorized degreaser was not in use, except during maintenance activities; and

g. any period of time during which the conveyorized degreaser was not operated and maintained and/or its solvents handled in accordance with the requirements of this permit.

The quarterly deviation reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the Standard Terms and Conditions.

These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), and OAC rule 3745-31-05(E)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

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

Applicable Compliance Method:

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

b. Emissions Limitation:

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

Applicable Compliance Method:

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

c. Emissions Limitation:

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

$NO_X$ = 0.10 lb/hr and 0.44 TPY;
PE = 0.008 lb/hr and 0.03 TPY;
$SO_2$ = 0.0006 lb/hr and 0.003 TPY;
CO = 0.084 lb/hr and 0.37 TPY; and
OC = 0.006 lb/hr and 0.02 TPY.

Applicable Compliance Method:

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

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

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

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(E)]

(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 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the 95% destruction efficiency requirement established for the catalytic incinerator;

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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

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

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.);

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 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating

parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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; and

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.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-04(A) and OAC rule 3745-31-05(E)]

(3) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in this permit. An intent to test notification shall not be required for catalyst activity testing. The procedures for the catalyst activity test shall be conducted in accordance with the manufacturer's recommendations and as required by the appropriate test method.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**7. P305, Billet side cut**

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

Billet Side Cut vented to a cyclone

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), as effective 11/30/01<br><br>(P0107341) | Particulate emissions (PE) shall not exceed 0.10 pound per hour (lb/hr) and 0.44 ton per year (TPY).<br><br>See b)(2)a., b)(2)b., and b)(2)d. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06<br><br>(P0107341) | See b)(2)c. |
| c. | OAC rule 3745-17-07(A)(1) | Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. |
| d. | OAC rule 3745-17-08(A)(1) | See b)(2)e. |
| e. | OAC rule 3745-17-11(B)(1) | The PE limitation established by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/01.<br><br>See b)(2)c.ii. |

(2) Additional Terms and Conditions

a. Best available technology (BAT) control requirements for this emissions unit have been determined to be the use of a cyclone. BAT also includes compliance with the terms and conditions of this permit. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

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

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE for this emissions unit because the controlled potential to emit for PE is less than ten tons per year; and

ii. PE shall not exceed 2.76 lbs/hr, based on Table I. See b)(2)f. and b)(2)g.

d. The hourly PE limitation was established to reflect the potential-to-emit for this emissions unit as vented to a cyclone and in accordance with the information provided in the PTI application. The operational restrictions, monitoring and/or recordkeeping, reporting and testing requirements that ensure that PE from this emissions unit are directed to the cyclone are sufficient to ensure compliance with this limitation.

e. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

f. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.

g. The hourly PE limitation established for this emissions unit in accordance with Table I of OAC rule 3745-17-11 is greater than the potential to emit. It is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) The permittee shall operate the cyclone for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the cyclone in accordance with the

manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term:OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the control equipment:

a. a log of the downtime for the control device when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the cyclone, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

a. a log of the downtime for the control device when the associated emissions unit was in operation;

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

c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

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

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitation:</u>

Particulate emissions shall not exceed 0.10lb/hr and 0.44 TPY(as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The controlled potential to emit for PE was established by multiplying the maximum number of billets processed per hour (17) by the emission factor provided in the PTI application (0.0548 lb PE/billet) and accounting for capture efficiency (90%) and control efficiency (99%) using the following calculations:

hourly potential PE = hourly potential stack PE + hourly potential fugitive PE

where,

hourly potential stack PE = maximum number of billets processed per hour * emission factor * (capture efficiency) * (1 - control efficiency); and

hourly potential fugitive PE = maximum number of billets processed per hour * emission factor * (1 - capture efficiency)

If required, the permittee shall demonstrate compliance with the hourly emissions limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

b. Emissions Limitation:

Particulate emissions shall not exceed 2.76lbs/hr.

Applicable Compliance Method:

The hourly emissions limitation was established in accordance with Table I of OAC rule 3745-17-11. The uncontrolled potential to emit for this emissions unit is calculated to be 0.93 lb PE/hr established by multiplying the maximum number of billets processed per hour (17) by the emission factor provided in the PTI application (0.0548lb PE/billet).

c. Emissions Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.