



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
ASHLAND COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov. Center  
P.O. Box 1049

**Application No: 03-16152**

**Fac ID: 0303000098**

**DATE: 2/26/2008**

MCI Service Parts, Inc.  
Carl Roth  
520 North Spring Street  
Loudonville, OH 44842

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

NWDO



Permit To Install  
Terms and Conditions

Issue Date: 2/26/2008  
Effective Date: 2/26/2008

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-16152**

Application Number: 03-16152  
Facility ID: 0303000098  
Permit Fee: **\$0**  
Name of Facility: MCI Service Parts, Inc.  
Person to Contact: Carl Roth  
Address: 520 North Spring Street  
Loudonville, OH 44842

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**520 North Spring Street**  
**Loudonville, Ohio**

Description of proposed emissions unit(s):  
**Administrative modification to Brake Shoe Burn Off Oven (N001) to revise secondary combustion chamber temperature requirement.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director

MCI Service Parts, Inc.  
PTI Application: 03-16152  
Modification Issued: 2/26/2008

Facility ID: 0303000098

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

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.

#### 4. 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

**MCI Service Parts, Inc.**  
**PTI Application: 03-16152**  
**Modification Issued: 2/26/2008**

**Facility ID: 0303000098**

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.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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).

**6. 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.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

**MCI Service Parts, Inc.**  
**PTI Application: 03-16152**  
**Modification Issued: 2/26/2008**

**Facility ID: 0303000098**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

#### **10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

MCI Service Parts, Inc.  
 PTI Application: 03-16152  
 Modification Issued: 2/26/2008

Facility ID: 0303000098

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.09
OC	0.09

MCI Service Parts, Inc.  
 PTI Application: 03-16152  
 Modif

Facility ID: 0303000098

Emissions Unit ID: N001

## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
N001 Natural Gas- Fired Brake Shoe Burn-Off Oven, with Afterburner (Administrative Modification of PTI# 03-16152 issued final on July 22, 2004.)	OAC rule 3745-31-05(A)(3)	0.02 lbs of particulate emissions (PE)/hour; 0.09 tons of PE/year
		0.02 lb of organic compound (OC)/hr, 0.09 ton of OC/year
		Opacity Restrictions (see A.2.a)
		Control Requirements (see A.2.b)
	OAC rule 3745-17-07(A)	See A.2.c
	OAC rule 3745-17-09(B)	See A.2.c
	OAC rule 3745-23-06(B)	See A.2.d
	OAC rule 3745-21-08(B)	See A.2.d

### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.
- 2.b Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of natural gas and afterburner. BAT requirements also include compliance with the terms and conditions of this permit.

- 2.c** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

## **B. Operational Restrictions**

1. The emissions unit shall be installed, operated and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the furnace, or physically modify the furnace in any way, without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit
2. The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:
  - a. the secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1400 degrees Fahrenheit, taking into account normal start-up procedures.
  - b. the secondary chamber shall allow for a minimum retention time of 0.5 seconds at 1400 degrees Fahrenheit, taking into account normal start-up procedures.
3. The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this furnace and shall comply with the following operational restrictions:

- a. the permittee shall ensure that the furnace is operated only by properly trained personnel who have read, and understand, the furnace's operation manual;
- b. prior to start-up of the furnace, the permittee shall remove ash residue left inside the furnace after the previous cycle;
- c. the permittee shall not operate the furnace if the built-in safeguards and interlocks (furnace excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and
- d. Emissions unit N001 shall only be used for the purpose of removing non-hazardous material (such as paint, oil, plastic, grease, etc) from reusable metal parts.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall install, operate, and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.
2. The permittee shall maintain an operation/maintenance log for the emissions unit. The log, at a minimum, shall contain the following information:
  - a. the dates the emissions unit was operated
  - b. the number of batches processed for each date the emissions unit was operated; and
  - c. the dates and descriptions of any additional maintenance activities performed on this emissions unit.

### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports in which provide the following information for each period during which the secondary chamber exhaust gas temperature fell below the applicable requirement:
  - a. the date of the excursion;

**MCI Service Parts, Inc.**  
**PTI Application: 02 16152**  
**Modif**

**Facility ID: 0303000098**

**Emissions Unit ID: N001**

- b. the temperature values during the excursion;
- c. the cause(s) for the excursion; and
- d. the corrective action which has been or will be taken to prevent similar excursions in the future.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

## **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation  
0.02 lbs of PE/hr

Applicable Compliance Method

The hourly emission limitation is based on manufacturer stack test data. If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation  
0.09 tons of PE/year

Applicable Compliance Method

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation  
0.02 lb OC/hr

Applicable Compliance Method

The hourly emission limitation is based on manufacturer stack test data. If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1- 4, 18, 25, or 25A of 40 CFR Part 60, Appendix A.

**MCI S****PTI A****Modification Issued: 2/26/2008**Emissions Unit ID: **N001**

- d. Emission Limitation  
0.09 ton of OC/year

Applicable Compliance Method

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation

Visible particulate emissions from this emissions unit shall not exceed 5% opacity except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.

Applicable Compliance Method

If required, compliance shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

None