

Facility ID: 0306020170 Issuance type: Final State Permit To Operate

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

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

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0306020170 Emissions Unit ID: N001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint Pyrolysis "Burn-off" Oven	ORC 3704.03(T)(4)	See A.2.a
	OAC rule 3745-31-02(A)(2) (PTI 03-17250 issued February 8, 2007)	See A.2.b
	OAC rule 3745-17-09(B)	0.10 pound particulate emission (PE) /100 pounds of liquid, semi-solid or solid refuse and salvageable material charged
	OAC rule 3745-17-09(C)	Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors (See B.1 and B.2)
	OAC rule 3745-17-07(A)	Visible PE from this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.10 pound PE/100 pounds of liquid, semi-solid or solid refuse and salvageable material charged under OAC rule 3745-17-09(B). Permit to Install 03-17250 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for purposes of avoiding BAT requirements under OAC rule-3745-31-05(A)(3) for organic compounds and particulate matter 10 microns or less in size:
 - i. use of a secondary combustion chamber designed and operated in accordance with the following requirements:
 - a. a minimum secondary combustion chamber temperature of 1400 degrees Fahrenheit, taking into account normal start-up procedures; and
 - b. a minimum retention time of 0.5 seconds at 1400 degrees Fahrenheit, taking into account normal start-up procedures.

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 burn-off oven, or physically modify the burn-off oven 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 permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this burn-off oven and shall comply with the following operational restrictions:
 - a. The permittee shall ensure that the burn-off oven is operated only by properly trained personnel who have read, and understand, the burn-off oven's operational manual.
 - b. Prior to start-up of the burn-off oven, the permittee shall remove ash residue left inside the burn-off oven after

the previous cycle.

c. the permittee shall not process uncured paint or paint sludge, paint filter, waste powder from powder coating operations, nitrocellulose paints, solvents, thinners, PVC (polyvinyl chloride), lead, plastisols, rubber-coated material, waste oil, waste grease, wood, trash, magnesium/magnesium alloy parts, oil filters, ammunition, explosives, fertilizer, or any hazardous waste materials as defined in 40 CFR Part 261, Subpart D in this burn-off oven. Paint hooks covered with coatings that may contain chlorine (e.g. PVC), fluorine (e.g. Teflon), sulfur, or elements other than carbon, hydrogen, and oxygen are also prohibited from being processed in this unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain an "electrical interlock system" which involves continuously monitoring the temperature, in degrees Fahrenheit, of the secondary combustion chamber. The interlock system shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The interlock system shall be programmed with a preset parameter that only allows operation of the paint burn-off oven when the temperature in the secondary combustion chamber meets a minimum value of 1400 degrees Fahrenheit. The interlock system shall also only allow operation of the emissions unit when monitoring devices associated with measuring the temperature in the secondary combustion chamber are operational (i.e. temperature monitor failure will shutdown emission unit operation).

The minimum temperature value of 1400 degrees Fahrenheit in the secondary combustion chamber is effective, 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 temperature value based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate and result in non-detectable levels of organic compounds for this emissions unit. In addition, approved revisions to the temperature value will not constitute a "modification" of the monitoring requirements of this permit and may be incorporated into the operating permit for the facility.

2. The permittee shall maintain records that document the following:
 - a. any time periods when the interlock system failed to operate in accordance with the requirements outlined in C.1.
 - b. all instances where the paint burn-off oven was operated with ash residue left inside the oven from a previous operation cycle.
 - c. all instances where the paint burn-off oven processed any of the materials outlined in B.2.c.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. any time periods when the electrical interlock system did not operate in accordance with the requirements specified in section C.1.
 - b. all instances where the paint burn-off oven was operated with ash residue left inside the oven from a previous operation cycle.
 - c. all instances where the paint burn-off oven processed any of the materials outlined in B.2.c.

Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

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

Emission Limitation:
Visible PE from this emissions unit shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

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

Emission Limitation:
0.10 pounds PE/100 pounds of material charged

Applicable Compliance Method:
If required, compliance with the particulate emission limitation shall be determined in accordance with OAC rule 3745-17-03 (B)(8).

F. Miscellaneous Requirements

1. None