OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
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George V. Voinovich
Governor

Donald R. Schregardus
Director

Re: Permit to Install
Stark County
Application No: 15-1155
NSPS

CERTIFIED MAIL

February 1, 1995

AKRO CORPORATION
CID VANCE
P.O. BOX 8650
CANTON, OH 44711

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 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. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CANTON AIR POLLUTION CONTROL

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 15-1155
APS Premise No. 1576050214
Permit Fee: $1150.00

Name of Facility: AKRO CORPORATION

Person to Contact: CID VANCE

Address: P.O. BOX 8650
CANTON, OH 44711

Location of proposed source(s): 1212 SEVENTH ST. SW
CANTON, OHIO

Description of proposed source(s):
2-25.2 MMBTU #6 OIL/#2 OIL/GAS BOILERS, 25 MMBTU #2 OIL/GAS BOILER (TEMPORARY), 39,950 GAL #6 OIL STORAGE TANK.

Date of Issuance: February 1, 1995

Effective Date: February 1, 1995

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the 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 and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R. Schregardus

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES(S)

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION 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.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for AKRO CORPORATION located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
B005	25.2 MMBTU/hr No. 6 Oil, No. 2 Oil or Natural Gas Fired Boiler	Compliance w/ 40 CFR Part 60 NSPS Subpart Dc Steam-Atomizing Burner	3745-31-05 3745-15-07 3745-17-07 3745-17-10 3745-18 40 CFR Part 60 NSPS Subpart Dc	.052 lb PM/MMBTU 1.3 lbs PM/hr 5.69 tons PM/yr .516 lb SO_2/MMBTU 13.2 lbs SO_2/hr 57.08 tons SO_2/yr .007 lb OC/MMBTU .176 lb OC/hr .77 ton OC/yr .382 lb NO_x/MMBTU 9.63 lbs NO_x/hr 42.18 tons NO_x/yr .033 lb CO/MMBTU .83 lb CO/hr 3.64 tons CO/yr

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
B006	25.2 MMBTU/hr No. 6 Oil, No. 2 Oil or Natural Gas Fired Boiler	Compliance w/ 40 CFR Part 60 NSPS Subpart Dc Steam-Atomizing Burner	3745-31-05 3745-15-07 3745-17-07 3745-17-10 3745-18 40 CFR Part 60 NSPS Subpart Dc	.052 lb PM/MMBTU 1.3 lbs PM/hr 5.69 tons PM/yr .516 lb SO_2/MMBTU 13.2 lbs SO_2/hr 57.08 tons SO_2/yr .007 lb OC/MMBTU .176 lb OC/hr .77 ton OC/yr .382 lb NO_x/MMBTU 9.63 lbs NO_x/hr 42.18 tons NO_x/yr .033 lb CO/MMBTU .83 lb CO/hr 3.64 tons CO/yr
B007	25.2 MMBTU/hr No. 2 Oil or Natural Gas Fired Boiler (Temporary)	Compliance w/ 40 CFR Part 60 NSPS Subpart Dc	3745-31-05 3745-15-07 3745-17-07 3745-17-10 3745-18 40 CFR Part 60 NSPS Subpart Dc	.02 lb PM/MMBTU .5 lb PM/hr 2.19 tons PM/yr .3 lb SO_2/MMBTU 7.6 lbs SO_2/hr 33.3 tons SO_2/yr .044 lb OC/hr .2 ton OC/yr 3.52 lbs NO_x/hr 15.42 tons NO_x/yr .88 lb CO/yr 3.85 tons CO/yr
T001	39,950 gal No. 6 Oil Storage Tank	Submerged Fill, Compliance with 40 CFR Part 60 NSPS Subpart Kb	3745-31-05 40 CFR Part 60 NSPS Subpart Kb	.1 ton OC/yr

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
PM	11.38
SO_2	114.16
OC	1.64
NO_x	84.36
CO	7.28

These total allowables do not include emissions from B007 because it is a temporary boiler. Much of these emissions will be offset by the shutdown of a 16.3 MMBTU coal fired boiler.

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

Source No.	Source Description	NSPS Regulation (Subpart)
B005	25.2 MMBTU/hr oil or gas boiler	Dc
B006	25.2 MMBTU/hr oil or gas boiler	Dc
B007	25 MMBTU/hr oil boiler (temporary)	Dc
T001	39,950 gal No.6 oil storage tank	Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

a. construction date (no later than 30 days after such date);
b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
c. actual start-up date (within 15 days after such date); and
d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and Canton Air Pollution Control
420 Market Ave. N., City Hall
Canton, Ohio 44702-1544

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.

B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.

C. Tests shall be performed for the following source(s) and pollutants(s):

Source	Pollutants
B005	NO_x

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

Source Number(s):	Tank Size:
T001	39,950 gallon

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Source B007 is a temporary boiler to be used while sources B005 and B006 are being constructed. This source shall operate for a period of not greater than 120 days. This source shall not operate after B005 or B006 begin operation.

   Akro Corporation shall notify the Canton Air Pollution Control Agency, in writing, of the exact date of dismantling and removal of this source and number of days operated.

2. - The heat input of B005 shall not exceed 25.2 MMBTU/hr.
   - The heat input of B006 shall not exceed 25.2 MMBTU/hr.
   - The heat input of B007 shall not exceed 25 MMBTU/hr.

3. The fuel consumed by sources B005 and B006 shall be limited to No. 6 oil or natural gas. The fuel consumed by source B007 shall be limited to No. 2 oil or natural gas.

4. The fuel oil burned in these sources shall meet the following specifications:

   a) for the fuel oil burned in sources B005 and B006 the 30-day rolling average sulfur content shall be 0.5 weight percent sulfur or less;

   b) for the fuel oil burned in source B007 the sulfur content shall not exceed 0.3 weight percent sulfur;

   c) the heat content of the #6 fuel oil shall be at least 133,000 BTU per gallon;

   d) the heat content of the #2 fuel oil shall be at least 124,000 BTU per gallon; and

   e) the fuel nitrogen content of the #6 fuel oil shall not exceed .5%.

   Compliance with the above mentioned specifications for sulfur content shall be determined using the guidelines found in 40 CFR Part 60 Subpart Dc.

5) Akro Corporation shall submit quarterly reports to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44720, for sources B005, B006 and B007. The initial quarterly report shall be postmarked by the 30th day of the third month following the completion of the initial performance test. Each subsequent quarterly report shall be postmarked by the 30th day following the end of the reporting period. Akro Corporation shall keep records and submit quarterly reports which contain the following information, as applicable:

a) the calendar dates covered in the reporting period;

b) the 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for any noncompliance with the sulfur limits; and a description of corrective actions taken;

c) a fuel supplier certification must be submitted. This fuel supplier certification shall include the following information:

1) for distillate oil:

a) the name of the oil supplier; and

b) a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR Part 60 Subpart Dc Section 60.41C.

2) for residual oil:

a) the name of the oil supplier;

b) the location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil, specifically including whether the oil was sampled as delivered to Akro, or whether the sample drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location;

c) the sulfur content of the oil from which the shipment came (or of the shipment itself); and

d) the method used to determined the sulfur content of the oil.

d) Akro shall record and maintain records of the amounts of each fuel combusted during each day;

e) the fuel nitrogen content of the No. 6 oil burnt in this source; and

f) all records required in this Term and Condition shall be maintained by Akro for a period of two years following the date of such record.

6) Sources B005 and B006 are replacing sources B002 and B003 two coal fired boilers.

7) The minimum stack height for sources B005 and B006 shall be 43.3 feet. The minimum stack height for B007 will be 17 feet.

8) The allowable emission comparisons between these two boilers and the old coal boiler is as follows:

	B005 & B006	B003
SO_2	114.16 TPY	228.46 TPY
PM	11.38 TPY	24.99 TPY

9) Sources B005 and B006 shall have steam - atomizing burners.