



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Scott J. Nally, Director

1/15/2013

Randy Parrish  
 KEN TOOL MANUFACTURING CO.  
 PO Box 9320  
 Akron, OH 44305

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677010304  
 Permit Number: P0112546  
 Permit Type: Renewal  
 County: Summit

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

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

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: ARAQMD



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
KEN TOOL MANUFACTURING CO.**

Facility ID:	1677010304
Permit Number:	P0112546
Permit Type:	Renewal
Issued:	1/15/2013
Effective:	1/15/2013
Expiration:	1/29/2019





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
KEN TOOL MANUFACTURING CO.

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**Final Permit-to-Install and Operate**  
KEN TOOL MANUFACTURING CO.  
**Permit Number:** P0112546  
**Facility ID:** 1677010304  
**Effective Date:** 1/15/2013

## Authorization

Facility ID: 1677010304  
Application Number(s): A0046593  
Permit Number: P0112546  
Permit Description: Renewal PTIO for a pyrolytic burn-off oven.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 1/15/2013  
Effective Date: 1/15/2013  
Expiration Date: 1/29/2019  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

KEN TOOL MANUFACTURING CO.  
768 E. NORTH ST.  
AKRON, OH 44305

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308  
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



**Final Permit-to-Install and Operate**  
KEN TOOL MANUFACTURING CO.  
**Permit Number:** P0112546  
**Facility ID:** 1677010304  
**Effective Date:** 1/15/2013

## Authorization (continued)

Permit Number: P0112546  
Permit Description: Renewal PTIO for a pyrolytic burn-off oven.

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

<b>Emissions Unit ID:</b>	<b>N002</b>
Company Equipment ID:	Burn- Off Oven
Superseded Permit Number:	P0102684
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
KEN TOOL MANUFACTURING CO.  
**Permit Number:** P0112546  
**Facility ID:** 1677010304  
**Effective Date:** 1/15/2013

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
KEN TOOL MANUFACTURING CO.  
**Permit Number:** P0112546  
**Facility ID:** 1677010304  
**Effective Date:** 1/15/2013

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



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
KEN TOOL MANUFACTURING CO.  
**Permit Number:** P0112546  
**Facility ID:** 1677010304  
**Effective Date:** 1/15/2013

## **C. Emissions Unit Terms and Conditions**



1. N002, Burn-off Oven

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

Pyrolytic burn-off oven incinerates dry paint hooks and paint paper filter, batch-charged, rated charging capacity 40 pounds of painted materials per hour, natural gas-fired, multiple-chambered[primary chamber burner capacity rating 0.090 million Btu per hour heat input and secondary chamber burner (afterburner) capacity rating0.425 million Btu per hour heat input].

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 16-02218)	Particulate emissions (PE) shall not exceed 0.50 ton per year.  The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-09(B) and 3745-17-09(C).
c.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-09(B)	PE shall not exceed 0.20 pound per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged, for incinerators having



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		incineration capacities less than onehundred pounds per hour.
e.	OAC rule 3745-17-09(C)	This incinerator, including all associated equipment and grounds, shall be designed,operated and maintained so as to prevent the emission of objectionable odors.
f.	OAC rule 3745-18-06(C)	Process equipment which has a rated capacity equal to, or less than, one thousandpounds per hour process weight input is exempt from paragraph (E) of this rule andfrom rules 3745-18-07 to 3745-18-94 of the Administrative Code.

(2) Additional Terms and Conditions

- a. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in the charge capacity, change in the fuel type or heat input rate, or change in the method of operation of emissions unit N002 that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.
- b. The ventilation system (i.e., air intake, exhaust, blowers, ductwork, and stack) for the emissions unit covered under this permit shall meet good engineering design so as to: (1) not compromise the airflow performance of the air intake, exhaust, blowers, ductwork, and stack for any emissions unit in the building; (2) not affect the air intake and exhaust for the building heating and cooling system and operation of building windows and doors; and (3) maximize air dispersion and minimize down-wash of emissions so as not to result in the exposure of concentrations of air contaminants and/or odors to employees, residents, visitors, and surrounding community that violates the public nuisance prohibition of OAC rule 3745-15-07.
- c. The permittee shall adjust, operate, and maintain the emissions unit covered under this permit in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The operator(s) shall be properly trained in the operation and maintenance of this unit. A copy of this permit shall be visibly posted near the incinerator.
- d. Ashes shall be removed from the primary chamber after each batch cycle. The afterburner shall be inspected and cleaned as necessary to ensure proper operation of the incinerator. All unnecessary items and non-combustible materials shall be removed from the material charged to this emissions unit.



- e. The permittee 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 emissions unit.
- c) Operational Restrictions
- (1) Except for additional restrictions and prohibitions noted in this section, the permittee shall use emissions unit N002 to incinerate materials in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall not incinerate materials in emissions unit N002 it is not recommended or designed for.
  - (2) The permittee shall burn only natural gas as fuel in this emissions unit.
  - (3) This emissions unit must be equipped with an afterburner (secondary combustion chamber burner) that shall be used at all times this emissions unit is in operation.
  - (4) This incinerator (loaded while cold and never opened until the batch cycle is complete) shall incorporate a lockout system, which will prevent recharging and/or ignition of materials until the exhaust gas temperature of the secondary combustion chamber reaches 1400 degrees Fahrenheit.
  - (5) The secondary combustion chamber of this incinerator shall be maintained at a minimum exhaust gas temperature of 1400 degrees Fahrenheit until the materials are completely combusted and the batch cycle is complete.
  - (6) The permittee shall not incinerate materials in emissions unit N002 at a rate that exceeds the rated charging capacity of 40 pounds per hour, as specified in the application.
  - (7) The permittee shall not incinerate materials in emissions unit N002 containing Teflon, PVC, nor any material listed under 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants.
  - (8) The permittee shall not incinerate materials in emissions unit N002 containing halogens such as chlorine, fluorine, or bromine.
  - (9) The permittee shall not incinerate materials in emissions unit N002 which may emit vapors of toxic metals such as lead, mercury, cadmium, or any metals and/or their compounds listed as hazardous air pollutants in the 1990 Clean Air Act Amendments.
  - (10) The permittee shall not incinerate materials in emissions unit N002 containing uncured paint or paint sludge, paint filters, plastisols, natural or synthetic rubber or rubber coated material, petroleum-derived products, wood, oils or grease, or magnesium.
  - (11) The permittee shall not incinerate materials in emissions unit N002 regulated by OAC Chapter 3745-75 "Infectious Waste Incinerator Limitations" or OAC Chapter 3745-105 "Pathological Waste Incinerators."



- (12) The permittee shall not incinerate trash, refuse or garbage in emissions unit N002.
  - (13) Any malfunction of emissions unit N002, or changes to equipment, materials incinerated, or method of operation of emissions unit N002, that causes the release of smoke and/or odors in excess of (1) emissions released during normal operations and/or (2) applicable visible emission standards and/or violates the public nuisance prohibition of OAC rule 3745-15-07 must be accompanied by a complete shutdown of emissions unit N002 until the problem is identified and corrected. Any malfunction shall be reported in accordance with the requirements of OAC rule 3745-15-06. Deviations from normal operations due to changes in equipment, materials incinerated, or method of operation of emissions unit N002 shall be reported in accordance with the requirements of the annual Permit Evaluation Report (PER) form specified in e)(1).
  - (14) Maintenance of the secondary combustion chamber (afterburner), that requires the shutdown or bypassing of the secondary chamber, must be accompanied by the complete shutdown of the primary combustion chamber of this incinerator.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
  - (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible 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 daily 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.



- (3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the secondary combustion chamber when the emissions unit is in operation. Units shall be in degrees Fahrenheit (degrees F). The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- (4) The permittee shall collect and record the following information for each day for the emissions unit:
  - (a) A log of the downtime for the temperature monitoring and/or recording equipment, when the associated emissions unit was in operation; and
  - (b) All periods of time during which the temperature of the exhaust gases from the incinerator, when the emissions unit was in operation, was below the minimum secondary combustion chamber exhaust gas temperature of 1400 degrees Fahrenheit as specified above.
- (5) For all materials incinerated in emissions unit N002, the permittee shall maintain a written log that contains the following information, on a per batch basis:
  - (a) date of incineration for each batch;
  - (b) complete identification and composition of all materials in each batch;
  - (c) duration of incineration, in hours, including start/finish times, for each batch;
  - (d) amount of material charged, in pounds, for each batch;
  - (e) calculated charging rate, in pounds per hour, for each batch, i.e., (d)/(c);
  - (f) identification of any materials under item (b) and/or calculated charging rate under item (e) of this section that did not comply with the applicable requirements of "c) Operational Restrictions" above; and
  - (g) a log of ash removal from the incinerator, as specified above in b)(2)(d).
- (6) The permittee shall inspect this incinerator semi-annually using preventive maintenance procedures recommended by the equipment manufacturer. Each inspection shall include a written log which documents the findings of the inspection and identifies any needed repairs to the unit. If repairs are needed, the incinerator shall not be operated if the operation would result in any exceedance of the emission limits detailed in this permit. Copies of contractor's invoices of maintenance and repairs shall be maintained for no less than five (5) years, and shall be available for inspection, upon request.
- (7) All records and logs required in this permit shall be maintained for no less than five (5) years, and shall be available for inspection, upon request.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The annual PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. It is recommended that the annual PER be submitted electronically through the Ohio EPA's "e-Business Center: Air Services", although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible particulate emissions..

f) Testing Requirements

- (1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:

PE shall not exceed 0.20 pound PE per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged, for incinerators having incineration capacities less than one hundred pounds per hour.

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed in accordance with USEPA Methods 1-5, 40 CFR 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(8).
  - c. Emission Limitation:

Particulate emissions (PE) from this emissions unit shall not exceed 0.50 ton per year.



**Final Permit-to-Install and Operate**  
KEN TOOL MANUFACTURING CO.  
**Permit Number:** P0112546  
**Facility ID:** 1677010304  
**Effective Date:** 1/15/2013

Applicable Compliance Method:

PE = (0.20 pound PE per one hundred pounds of painted parts) x (40 pounds of painted parts per hour) x (8760 hours per year) x (1 ton per 2000 pounds) = 0.35 ton/year, which is less than the above 0.50 ton PE per year emission limitation.

g) Miscellaneous Requirements

(1) None.