

Facility ID: 0332010063 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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.

- [Go to Part II for Emissions Unit K003](#)
- [Go to Part II for Emissions Unit K004](#)
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Facility ID: 0332010063 Emissions Unit ID: K003 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>
Tubing coating line with (2) 10 line primer line flow coaters, RF drying oven, topcoat flow coater, natural gas drying ovens, and regenerative thermal oxidizer	OAC rule 3745-31-05(A)(3) (PTI #03-13631, issued 11/02/06)	1.78 lbs of volatile organic compounds (VOC)/hour; 7.80 tons of VOC/year
	OAC rule 3745-21-09(B)(6)	Use of a thermal oxidizer (see A.2.a) See A.I.2.b

**2. Additional Terms and Conditions**

- (a) "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be use of a regenerative thermal oxidizer for control of VOC. The thermal oxidizer shall be designed and operated to achieve a minimum overall control efficiency of 95% (100% capture and 95% destruction efficiency).  
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**B. Operational Restrictions**

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. the name and identification number of each primer, topcoat, and thinner employed;
  - b. the VOC content of each primer, topcoat, and thinner employed, in pounds per gallon;
  - c. the number of gallons of each primer, topcoat, and thinner employed;
  - d. the total controlled VOC emissions from all primers, topcoats, and thinners employed, in pounds, calculated by using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. the annual, year-to-date VOC emissions from all primers, topcoats, and thinners (sum of d for each month to date from January to December).
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. 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.
3. The permittee shall collect and record the following information each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.
4. The Permit to Install for emissions units K003 and K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isophorone  
 TLV (mg/m3): 28  
 Maximum Hourly Emission Rate (lbs/hr): 1.23  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.96  
 MAGLC (ug/m3): 491.33

Pollutant: Xylene  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (lbs/hr): 0.39  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 27.89  
 MAGLC (ug/m3): 10,333.33

Pollutant: MIBK  
 TLV (mg/m3): 205  
 Maximum Hourly Emission Rate (lbs/hr): 0.47  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.61  
 MAGLC (ug/m3): 4880.95

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports that identify the following:
  - a. all 3- hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation; and
  - c. any exceedances of the VOC emission limitations specified in section A.I.1.

These deviation 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.I.1 shall be determined in accordance with the following methods:
    - Emission Limitation  
1.78 lbs of VOC/hour
    - Applicable Compliance Method  
The hourly emission limitation represents the potential to emit of the emissions unit and was established by applying an overall control efficiency of 95% to the following maximum usage rates and VOC contents of each primer, topcoat, and thinner:
      - NP-23H Primer: 0.46 gallon/hour @ 5.70 lbs of VOC/gallon
      - Olive M Topcoat: 1.71 gallons/hour @ 5.26 lbs of VOC/gallon
      - PA Primer: 0.34 gallon/hour @ 5.76 lbs of VOC/gallon
      - Reducer: 2.85 gallons/hour @ 7.70 lbs of VOC/gallon
    - Compliance shall be demonstrated by the emission testing requirements in section A.V.2.
      - Emission Limitation  
7.80 tons of VOC/year
      - Applicable Compliance Method  
The annual emission limitation was established by multiplying the maximum hourly emission rate by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will also be assumed.
  
  2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - The emission testing shall be conducted within 6 months following the first day this emissions unit commences modified operations as allowed for by this PTO.
    - The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rate for VOC and the minimum overall control efficiency of 95% for VOC (100% capture and 95% destruction efficiency).
    - The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:
      - VOC: Methods 1 - 4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A
    - The test method(s) which must be employed to demonstrate compliance with the control efficiency for VOC are listed below. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.
    - 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 Ohio EPA, Northwest District Office.
    - The capture efficiency shall be determined using applicable criteria from 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 U.S. EPA'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.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
    - Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emissions test (s).
    - Personnel from the Northwest District Office 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.
    - A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test(s) and submitted to the Northwest District Office 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 Northwest District Office.
- F. Miscellaneous Requirements**
1. This permit establishes federally enforceable limitations on VOC for the purpose of having the controlled VOC emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3) by requiring to have VOCs controlled by a regenerative thermal oxidizer with an overall control efficiency of 95% (100% capture and 95% destruction efficiency) and a maximum mass emission rate of 1.78 pounds per hour.

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Facility ID: 0332010063 Emissions Unit ID: K004 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>
Tubing coating line with 10 line flow coater, RF drying oven, and regenerative thermal oxidizer	OAC rule 3745-31-05(A)(3) (PTI #03-16361, issued 11/02/06)	0.84 lbs of volatile organic compounds (VOC)/hour; 3.68 tons of VOC/year
	OAC rule 3745-21-09(B)(6)	Use of a thermal oxidizer (see A.2.a) See A.I.2.b

**2. Additional Terms and Conditions**

- (a) "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be use of a regenerative thermal oxidizer for control of VOC. The thermal oxidizer shall be designed and operated to achieve a minimum overall control efficiency of 95% (100% capture and 95% destruction efficiency).  
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**B. Operational Restrictions**

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. the name and identification number of each primer, topcoat, and thinner employed;
  - b. the VOC content of each primer, topcoat, and thinner employed, in pounds per gallon;
  - c. the number of gallons of each primer, topcoat, and thinner employed;
  - d. the total controlled VOC emissions from all primers, topcoats, and thinners employed, in pounds, calculated by using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. the annual, year-to-date VOC emissions from all primers, topcoats, and thinners (sum of d for each month to date from January to December).
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. 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.
3. The permittee shall collect and record the following information each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.
4. The Permit to Install for emissions units K003 and K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isophorone

TLV (mg/m3): 28

Maximum Hourly Emission Rate (lbs/hr): 1.23  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.96  
 MAGLC (ug/m3): 491.33

Pollutant: Xylene

TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (lbs/hr): 0.39  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 27.89  
 MAGLC (ug/m3): 10,333.33

Pollutant: MIBK

TLV (mg/m3): 205  
 Maximum Hourly Emission Rate (lbs/hr): 0.47  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.61  
 MAGLC (ug/m3): 4880.95

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify the following:
  - a. all 3- hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation; and
  - c. any exceedances of the VOC emission limitations specified in section A.I.1.

These deviation 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.I.1 shall be determined in accordance with the following methods:
 

Emission Limitation  
0.84 lb of VOC/hour

Applicable Compliance Method  
The hourly emission limitation represents the potential to emit of the emissions unit and was established by applying a 95% overall control efficiency to the following maximum usage rates and VOC contents of the primer coating and thinner:

PA Primer: 1.25 gallons/hour @ 5.76 lbs of VOC/gallon  
 Reducer: 1.25 gallons/hour @ 7.70 lbs of VOC/gallon

Compliance shall be demonstrated by the emissions testing requirements in section A.V.2.  
 Emission Limitation  
3.68 tons of VOC/year

**Applicable Compliance Method**

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

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months following the first day this emissions unit commences modified operations as allowed for by this PTO.

The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rate for VOC and the minimum overall control efficiency of 95% for VOC (100% capture and 95% destruction efficiency).

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

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

The test method(s) which must be employed to demonstrate compliance with the control efficiency for VOC are listed below. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

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 Ohio EPA, Northwest District Office.

The capture efficiency shall be determined using applicable criteria from 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 U.S. EPA'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.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emissions test (s).

Personnel from the Northwest District Office 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test(s) and submitted to the Northwest District Office 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 Northwest District Office.

**F. Miscellaneous Requirements**

1. This permit establishes federally enforceable limitations on VOC for the purpose of having the controlled VOC emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3) by requiring to have VOCs controlled by a regenerative thermal oxidizer with an overall control efficiency of 95% (100% capture and 95% destruction efficiency) and a maximum mass emission rate of 0.84 pound per hour.

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Facility ID: 0332010063 Emissions Unit ID: P006 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>
Brazing oven for metal tubing (electric) with exothermic (Rx) gas generation	OAC rule 3745-31-05(A)(3) (PTI #03-16075, issued 11/25/03) OAC rule 3745-21-08(B)	2.16 lbs of carbon monoxide (CO)/hour; 9.46 tons of CO/year See A.2.a

**2. Additional Terms and Conditions**

- (a) The permittee has satisfied 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).

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. None

**C. Monitoring and/or Record Keeping Requirements**

- 1. None

**D. Reporting Requirements**

- 1. None

**E. Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitations:  
2.16 lbs of carbon monoxide (CO)/hour;  
9.46 tons of CO/year

Applicable Compliance Methods:

The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\* The potential to emit is based on a maximum generation capacity of exothermic gas of 12,000 cubic feet per hour and a CO emission factor of 0.18 pound per 1000 cubic feet (based on in-house emissions testing of a similar unit).

The annual allowable CO limitation was developed by multiplying the hourly limitation by 8760 hours per year and dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is also shown with the annual limitation.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 0332010063 Emissions Unit ID: P007 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>
Brazing oven for metal tubing (electric) with exothermic (Rx) gas generation	OAC rule 3745-31-05(A)(3) (PTI #03-16289, issued 05/12/05) OAC rule 3745-21-08(B)	1.26 lbs of carbon monoxide (CO)/hour; 5.52tons of CO/year See A.2.a

2. **Additional Terms and Conditions**

- (a) The permittee has satisfied 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).

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. None

C. **Monitoring and/or Record Keeping Requirements**

- 1. None

D. **Reporting Requirements**

- 1. None

E. **Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitations:  
1.26 lbs of carbon monoxide (CO)/hour;  
5.52 tons of CO/year

Applicable Compliance Methods:  
The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\* The potential to emit is based on a maximum generation capacity of exothermic gas of 7,000 cubic feet per hour and a CO emission factor of 0.18 pound per 1000 cubic feet (based on in-house emissions testing of a similar unit).

The annual allowable CO limitation was developed by multiplying the hourly limitation by 8760 hours per year and dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is also shown with the annual limitation.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A.

F. **Miscellaneous Requirements**

- 1. None