State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

RE: FINAL PERMIT TO INSTALL MODIFICATION
STARK COUNTY
Application No: 15-01704
Fac ID: 1576000218

DATE: 6/12/2008

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
40 CFR Part 60, subpart UUU	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Saint Gobain NorPro Corp.
Dale Clark
3840 Fishcreek Rd.
Stow, OH 44224

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

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

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

Sincerely,

Michael W. Ahern

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

CC: USEPA Canton LAA

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 6/12/2008**
Terms and Conditions **Effective Date: 6/12/2008**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 15-01704

Application Number: 15-01704

Facility ID: 1576000218

Permit Fee: **$500**

Name of Facility: Saint Gobain NorPro Corp.

Person to Contact: Dale Clark
Address: 3840 Fishcreek Rd.
Stow, OH 44224

Location of proposed air contaminant source(s) [emissions unit(s)]:
3021 Saratoga Ave., SW
Canton,Ohio

Description of proposed emissions unit(s):
Administrative modification to correct inaccurate data provided by the company.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	0.67
PE	0.31

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(P002) - Catalyst ceramic Base Spray Dryer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO_2, CO, NOx, and VOC from this air contaminant source since the uncontrolled potential to emit for PM, SO_2, CO, and VOC is less than ten tons per year.
40 CFR Part 60.732 (Subpart UUU)	0.025 grains PE/dscf
OAC rule 3745-17-11(A)(2)	2.03 lbs PE/hour (Based on a process weight rate of 700 lbs/hr. and Table 1 in OAC rule 3745-17-11.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the control device stack shall not exceed twenty percent (20 %) opacity, as a six-minute average except as provided by rule.
OAC rule 3745-17-10(B)(1)	0.02 lb PE/MMBtu of actual heat input

2. **Additional Terms and Conditions**

   2.a The allowable emission rate for NOx is based on the Potential to Emit for this emission unit. Therefore, no monitoring, record keeping, or reporting is required to demonstrate compliance.

B. Operational Restrictions

1. The daily average 2-hour pressure drop across the wet scrubber, as determined in section C.2, shall be greater than or equal to 90 % of the average pressure drop value recorded as specified in section E.x of this permit during the most recent performance test that demonstrated compliance with the particulate matter standard of 0.025 lbs PE/dscf.

2. The daily wet scrubber liquid flow rate recorded in accordance with section C.3 of this permit shall be greater than or equal to 80% and less than or equal to 120% of the average value recorded as

specified in section E.x of this permit during the most recent performance test that demonstrated compliance with the particulate matter standard of 0.025 lbs PE/dscf.

C. Monitoring and Record keeping

40 CFR Part 60.734(d)]

1. The permittee shall install, calibrate, maintain, and operate monitoring devices that continuously measure and record the pressure loss of the gas stream through the scrubber and the scrubbing liquid flow rate to the scrubber.

[40 CFR Part 60.735(a and b) (Sections C.2 through C.5)]

2. The pressure loss monitoring device must be certified by the manufacturer to be accurate within 5 percent of water column gauge pressure at the level of operation.

3. The liquid flow rate monitoring device must be certified by the manufacturer to be accurate within 5 percent of design scrubbing liquid flow rate.

4. All records must be maintained for at least 2 years.

5. The permittee shall maintain daily readings consisting of the arithmetic average over a 2 hour period of both the change in pressure of the gas stream across the scrubber and the flow rate of the scrubbing liquid.

6. The permittee shall perform weekly checks when the emissions unit is in operation during daylight hours and when the weather conditions allow, for any visible particulate emissions from the discharge 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 note the following in the operations log.

   a. the color of the emissions;
   b. whether the emissions are representative of the 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 eliminate the visible particulate emissions; and

   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 weekly 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.

7. The permit to install for this emissions unit P001 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Ammonia
   TLV (mg/m3): 25 ppm (18.275 mg/m3)
   Maximum Hourly Emission Rate (lbs/hr): 7 lb/hour
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 400
   MAGLC (ug/m3): 439

   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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

   b. changes in the composition 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.).

   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) meet(s) the definition of a "modification" under other provisions of the rule, 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 evaluations 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 the 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

[40 CFR Part 60.734(c)(Sections D.1)]

1. The permittee shall submit semiannual reports indicating any deviations(exceedances) of control device operating parameters as specified below:

   a. Any daily 2-hour average of the wet scrubber pressure drop determined in accordance with section C.2 above that is less than 90% of the average pressure drop value recorded in accordance with section E.x of this permit during the most recent performance test that demonstrated compliance with the particulate matter standard of 0.025 lbs PE/dscf.

   b. Any daily wet scrubber liquid flow rate recorded in accordance with section C.3 above that is less than 80% or greater than 120% of the average value recorded in accordance with section E.x of this permit during the most recent performance test that demonstrated compliance with the particulate matter standard of 0.025 lbs PE/dscf.

2. The permittee shall submit semiannual written reports that:

   a. identify all periods of time during which visible emissions were observed from the stack serving this emissions unit; and

   b. describe any corrective actions taken to eliminate the visible emissions.

E. Testing Requirements

1. Compliance with the emission limitations of this permit shall be demonstrated by using the following methods and procedures:

a. Emission Limitation:

0.025 grains PE/dscf

Applicable compliance method:

If required, the permittee shall demonstrate compliance with the allowable hourly emission rate by using US EPA methods 1 thru 4 and 5 as specified in 40 CFR Part 60, Subpart A. Otherwise compliance shall be demonstrated by the absence of any visible emissions from the control device stack serving this emissions unit.

b. Emission limitation:

~~2.03~~ lbs PE/hour
0.02 lb PE/MMBtu of actual heat input

Applicable compliance method:

If required, the permittee shall demonstrate compliance through emission testing by using U.S. EPA methods 1 thru 5 as specified in 40 CFR Part 60, Subpart A. Otherwise compliance shall be demonstrated by the absence of any visible emissions from the control device stack serving this emissions unit.

c. Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed twenty percent (20 %) opacity, as a six-minute average except as provided by rule.

Applicable compliance method:

If required, the permittee shall demonstrate compliance through visible emission observations performed in accordance with U.S. EPA Method 9 as specified in 40 CFR Part 60, Subpart A and procedures specified in OAC rule 3745-17-03(B)(1).

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

a. The emission testing shall be conducted in accordance with the schedule arranged between the permittee and the Canton local air agency.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE in section A.I.1 in accordance with 40 CFR Part 60.8.

c. To demonstrate compliance with the allowable mass emission rate(s) for PE the permittee shall employ test Method(s) 1-5, respectively from 40 CFR Part 60, Appendix A. Alternative

U.S. EPA approved test methods may be used with prior approval from the Ohio EPA and the Canton local air agency.

d. For PM, the sampling time and volume for each test run conducted during the performance test shall be at least 2 hours and 1.70 dscm respectively. The permittee shall also use the monitoring devices specified in section C.1 to determine the average change in pressure fo the gas stream across the scrubber and the average flowrate of the scrubber liquid during each of the PM runs. The arithmetic averages of the three runs shall be used as the baseline average values for determining compliance with the terms and conditions in sections A.2.a and A.2.b.

e. The test(s) shall be conducted while this emissions unit is operating at or near maximum capacity unless otherwise specified and approved by the Ohio EPA and the Canton APCD.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton LAA. 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 Canton LAA's refusal to accept the results of the emission test(s).

Personnel from the Canton LAA 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 tests and submitted to the Canton LAA 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 Canton LAA.

F. Miscellaneous Requirements

None