



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
WOOD COUNTY
Application No: 04-01076

DATE: 3/21/2002

Pilkington North America, Inc.
Charles Baumgartner
140 Dixie Highway
Rossford, OH 43460-1215

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

TDES

Toledo Metro. Area Council of Gov.

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**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 04-01076

Application Number: **04-01076**
APS Premise Number: **0487010012**
Permit Fee: **\$ To be entered upon final issuance**
Name of Facility: **Pilkington North America, Inc.**
Person to Contact: **Charles Baumgartner**
Address: **140 Dixie Highway
Rossford, OH 434601215**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**140 Dixie Highway
Rossford, OHIO**

Description of modification:

This modification adds the use of fuel oil which increases the CO and VOC emission limits. Emission limits for selenium are also added.

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

Director

Pilkington North America, Inc.

Facility ID: **0487010012**

PTI Application: 04-01076

Modification Issued: To be entered upon final issuance

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Pilkington North America, Inc. -Rossford** located in **WOOD** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P001 Modify	6F1 Float glass melting furnace fueled by natural gas and/or #2 fuel oil	Salt cake usage limit not to exceed the equivalent of 13 pounds salt cake per thousand pounds sand	3745-31-05 3745-17-11(B) 3745-18-06(D)(2) 3745-17-07 3745-31-10 through 20	83.27 lbs NO _x /hour 364.7 tons NO _x per year, based upon a rolling, 12-month summation of the monthly emissions; 38.91 lbs particulate/hour 149.6 tons particulate *per year, based upon a rolling, 12-month summation of the monthly emissions; 55.67 lbs SO ₂ /hour 243.84 tons SO ₂ per year, based upon a rolling, 12-month

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
summation of the monthly emissions; emissions; 3.88 lbs CO/hour	summation of the monthly emissions; 25.64 lbs of sulfuric acid mist/hour			
16.99 tons CO per year, based upon a rolling, 12-month summation of the monthly emissions;	112.34 tons of sulfuric acid mist per year, based upon a rolling, 12-month summation of the monthly emissions;			
12-month summation of the monthly emissions; emissions; 2.45 lbs VOC/hour	Salt cake usage limit not to exceed the equivalent of 13 pounds salt cake per thousand pounds sand; 20% Opacity as a six-minute average, except as provided by rule.			
10.75 tons VOC per year, based upon a rolling, 12-month				

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**SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>	<u>Increase After Modification Tons/Year</u>
NOx	364.7	-273.45
Particulate	149.6	10.03
SO2	243.84	37.61
CO	16.99	8.21
VOC	10.75	1.97
Sulfuric Acid Mist	112.34	17.71

CONSTRUCTION STATUS

The **Toledo Pollution Control Division** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **P001**.

PSD REQUIREMENTS

The source described in this Permit to Install is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency 40 CFR 52.21. The authority to apply and enforce the PSD regulations has been delegated to the Ohio Environmental Protection Agency. The terms and conditions of this permit and the requirements of the PSD regulations are also enforceable by the United States Environmental Protection Agency.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply: (1) the effective date of this permit shall be 30 days after the service of notice to any public commentors of the final decision to issue, modify, or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service of notice; and (2) if an appeal is made to the Administrator of the United States Environmental Protection Agency, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

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RECORD(S) RETENTION AND AVAILABILITY

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

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Toledo Division of Environmental Services, 348 S. Erie St, Toledo, Ohio 43602.**

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Toledo Division of Environmental Services, 348 S. Erie St, Toledo, Ohio 43602.**

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

AIR POLLUTION NUISANCES PROHIBITED

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

NINETY DAY OPERATING PERIOD

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

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The emissions of particulate from this emissions unit shall not exceed 149.6 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions Of particulate (Tons)</u>
1	14
1-2	28
1-3	42
1-4	56
1-5	70
1-6	84
1-7	98
1-8	112
1-9	126
1-10	140
1-11	149.6
1-12	149.6

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for particulate shall be based upon a rolling, 12-month summation of the monthly emissions.

- The emissions of sulfuric acid mist from this emissions unit shall not exceed 112.34 tons per year, based upon a rolling, 12- month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions Of sulfuric acid mist (Tons)</u>
1	9.5
1-2	19
1-3	28.5
1-4	38
1-5	47.5
1-6	57
1-7	66.5

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1-8	76
1-9	85.5
1-10	95
1-11	104.5
1-12	112.34

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for sulfuric acid mist shall be based upon a rolling, 12-month summation of the monthly emissions.

3. The maximum annual salt cake and gypsum usage for this emissions unit shall not exceed the equivalent of 13 pounds salt cake per thousand pounds of sand employed, based upon a rolling, 12-month summation of the salt cake and gypsum usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the equivalent of 13 pounds of salt cake per thousand pounds of sand employed as a cumulative average.

4. The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

B. Monitoring and Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The tons of glass draw produced, the pounds of salt cake, pounds of gypsum, and pounds of sand employed; and
- b. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative tons of glass draw produced for each calendar month. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of glass draw produced.
 2. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

C. Reporting Requirements

1. The permittee shall submit (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for particulate matter and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for sulfuric acid mist and, for the first 12 calendar months

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of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the equivalent of 13 pounds of salt cake per thousand pounds of sand employed.

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4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.
5. The permittee shall also submit annual reports which specify the total particulate (or equivalent particulate matter less than 10 microns), carbon monoxide, sulfur dioxide, volatile organic compounds, nitrogen oxide and sulfuric acid mist emissions from this emission unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

The permittee shall submit required reports in the following manner:

- a. 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 Toledo Division of Environmental Services. 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 quarterly, i.e., 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).

D. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for emissions unit P001 in accordance with the following requirements:
 - a. Initial emission testing shall be completed within 180 days of commercial operation of the unit;
 - b. The emission testing shall be conducted to demonstrate compliance with the

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allowable mass emission rate(s) for NO_x particulate, SO₂ and sulfuric acid mist, and

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

NO _x	Method 7 of 40 CFR Part 60, Appendix A
Particulate	Method 5 of 40 CFR Part 60, Appendix A
SO ₂	Method 6 of 40 CFR Part 60, Appendix A
Sulfuric Acid Mist	Method 8 of 40 CFR Part 60, Appendix A

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The permittee may request to use an alternative method or procedure. 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.

2. 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 Toledo Division of Environmental Services.

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the Toledo Division of Environmental Services 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s).

4. Compliance with the emission limitation shall be determined in accordance with the following method(s):

a. Emission Limitation:
less than or equal to 20 percent opacity, as a 6-minute average

Applicable Compliance Method:
OAC 3745-17-03(B)(1)

b. Emission Limitation:
less than or equal to the amount of salt cake /or gypsum employed which is the equivalent to 13 pounds of salt cake per thousand pounds of sand employed.

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Applicable Compliance Method:

$$EF=(A+(B*0.72))/C$$

Where:

EF=13 pounds of salt cake per thousand pounds of sand employed

A= the amount of salt cake (Na_2SO_4) employed, in pounds

B= the amount of gypsum ($\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$)

C= the amount of sand employed, in thousand pounds

c. Emission Limitation:

25.64 pounds of Sulfuric acid mist per hour

Applicable Compliance Method:

Method 8 of 40 CFR Part 60, Appendix A

d. Emission Limitation:

112.34 tons of Sulfuric acid mist per year or 25.64 lb/hr

Applicable Compliance Method:

Multiply the sulfuric acid mist emission factor of 1.078 in pounds of sulfuric acid mist per ton of glass draw (unless emission testing shows that another emission factor is appropriate), by the rolling, 12-month summation of the production of glass draw in tons found in Additional Special Term and Condition 1.b. under the Monitoring and Recordkeeping Requirements section of this permit.

e. Emission Limitation:

38.91 pounds/hour of particulate matter

Applicable Compliance Method:

OAC rule 3745-17-03(B)(10)

f. Emission Limitation:

149.6 tons of particulate matter per year

Applicable Compliance Method:

Multiply the particulate emission factor, determined during the most recent stack test that demonstrated compliance, in pounds of particulate matter per ton of glass draw, by the rolling, 12-month summation of the production of glass draw in tons found in Additional Special Term and Condition 1.b. under the Monitoring and Recordkeeping Requirements

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section of this permit.

g. Emission Limitation:

55.67 lbs/hr of sulfur dioxide

Applicable Compliance Method:

OAC rule 3745-18-04

h. Emission Limitation:

243.84 tons of sulfur dioxide per year

Applicable Compliance Method:

Multiply the sulfur dioxide emission factor, determined during the most recent stack test that demonstrated compliance, in pounds of sulfur dioxide per ton of glass draw, by the rolling, 12-month summation of the production of glass draw in tons found in Additional Special Term and Condition 1.b. under the Monitoring and Recordkeeping Requirements section of this permit.

i. Emission Limitation:

3.88 pounds per hour of carbon monoxide

Applicable Compliance Method:

The hourly carbon monoxide emission limit is based on the maximum amount of production of glass draw in tons multiplied by the carbon monoxide emission factor of 0.1 in pounds of carbon monoxide per ton glass draw.

j. Emission Limitation:

16.99 tons of carbon monoxide per year

Applicable Compliance Method:

Multiply the carbon monoxide emission factor of 0.1 pound of carbon monoxide per ton glass draw, by the rolling 12-month summation of the production of glass draw in tons found in Additional Special Term and Condition 1.b. under the Monitoring and Recordkeeping Requirements section of this permit.

k. Emission Limitation:

2.45 pounds/hr of volatile organic compounds

Applicable Compliance Method:

The hourly volatile organic compound emission limit is based on the maximum amount of

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production of glass draw in tons multiplied by the volatile organic compound emission factor of 0.1 in pounds of volatile organic compound per ton of glass draw.

- l. Emission Limitation:
10.75 tons of volatile organic compounds per year

Applicable Compliance Method:

Multiply the volatile organic compound emission factor of 0.1 in pounds of "volatile organic compound" per ton of glass draw, by the rolling 12-month summation of the production of glass draw in tons found in Additional Special Term and Condition 1.b. under the Monitoring and Recordkeeping Requirements Section of this permit.

- m. Emission Limitation:
83.27 lbs/hr of NO_x

Applicable Compliance Method:

Use the NO_x emission factor, in pounds of NO_x per hour, determined during the most recent stack test in which compliance was demonstrated.

- n. Emission Limitation:
364.73 tons of NO_x per year

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Applicable Compliance Method:

Multiply the NO_x emission factor, determined during the most recent stack test that demonstrated compliance, in pounds of NO_x per ton of glass draw, by the rolling 12-month summation of the production of glass draw in tons found in Additional Special Term and Condition 1.b. under the Monitoring Recordkeeping Requirements section of this permit.

E. Miscellaneous Requirements

NOTE: The following terms and conditions are not Federally enforceable but are enforceable by the State.

1. The permit to install for this emission unit (P001) was evaluated based on the actual materials and the design parameters of the emission 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: Selenium

TLV (mg/m³): 0.2 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 3.05

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 0.7789

MAGLC (ug/m³): 4.76

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 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

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the lowest TLV value previously modeled;

- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emission 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.).

Pilkington North America, Inc.

Facility ID: **0487010012**

PTI Application: 04-01076

Modification Issued: To be entered upon final issuance

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. 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 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.