



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  
COSHOCOTON COUNTY  
Application No: 06-06645**

**CERTIFIED MAIL**

**DATE: 11/20/2001**

J & J Cores  
Richard Lehman  
22375 Oxford Twp Rd 105  
Newcomerstown, OH 43832

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 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 a fee of **\$400** 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

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SEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 06-06645**

Application Number: 06-06645  
APS Premise Number: 0616000204  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: J & J Cores  
Person to Contact: Richard Lehman  
Address: 22375 Oxford Twp Rd 105  
Newcomerstown, OH 43832

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**22375 Oxford Twp Rd 105  
Newcomerstown, Ohio**

Description of proposed emissions unit(s):  
**Aluminum melting furnace with afterburner.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**J & J Cores**

**Facility ID: 0616000204**

**PTI Application: 06-06645**

**Issued: To be entered upon final issuance**

**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 Related to Monitoring and Recordkeeping 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 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.)

**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

**J & J Cores**

**Facility ID: 0616000204**

**PTI Application: 06-06645**

**Issued: To be entered upon final issuance**

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

**J & J Cores**

**PTI Application: 06-06645**

**Issued: To be entered upon final issuance**

lead to such sanctions

**Facility ID: 0616000204**

**J & J Cores**

**Facility ID: 0616000204**

**PTI Application: 06-06645**

**Issued: To be entered upon final issuance**

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**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**

- a. 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

**J & J Cores**

**Facility ID: 0616000204**

**PTI Application: 06-06645**

**Issued: To be entered upon final issuance**

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).

- b. 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.

#### **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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	4.38

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Aluminum Sweat Furnace with afterburner	40 CFR Part 63 Subpart RRR	Afterburner shall have a design residence time of 0.8 seconds or greater and an operating temperature of 1600 degrees F or greater.
		0.80 nanogram (ng) of D/F TEQ per dscm ( $3.5 \times 10^{-10}$ gr per dscf) at 11 percent oxygen (O <sub>2</sub> )
		See A.2.a.
	OAC 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 1 pound per hour, and 4.38 tons per year
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart RRR and OAC rule 3745-17-07(A)
	OAC rule 3745-17-11(B)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity as a six-minute average, except as specified by rule

9

**J & J**

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Emissions Unit ID: P002

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## 2. Additional Terms and Conditions

### 2.a [40 CFR Part 63 Subpart RRR Section 1505]

- i. The owner or operator of a sweat furnace shall comply with the emission standard of paragraph (f)(2) of this section.
  - (a) The owner or operator is not required to conduct a performance test to demonstrate compliance with the emission standard of paragraph (f)(2) of this section, provided that, on and after the compliance date of this rule, the owner or operator operates and maintains an afterburner with a design residence time of 0.8 seconds or greater and an operating temperature of 1600 deg.F or greater.
  - (b) On and after the date the initial performance test is conducted or required to be conducted, or if no compliance test is required, on and after the compliance date of this rule, whichever date is earlier, the owner or operator of a sweat furnace at a secondary aluminum production facility that is a major or area source must not discharge or cause to be discharged to the atmosphere emissions in excess of 0.80 nanogram (ng) of D/F TEQ per dscm ( $3.5 \times 10^{-10}$  gr per dscf) at 11 percent oxygen (O<sub>2</sub>).

## B. Operational Restrictions

### 1. [40 CFR Part 63 Subpart RRR Section 1506]

- a. The owner or operator of a sweat furnace with emissions controlled by an afterburner must:
  - i. Maintain the 3-hour block average operating temperature of each afterburner at or above:
    - ii. The average temperature established during the performance test; or
    - iii. 1600 deg.F if a performance test was not conducted, and the afterburner meets the specifications of Sec. 63.1505(f)(1).
  - iv. Operate each afterburner in accordance with the OM&M plan.
- b. When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated



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- to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
- vi. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in paragraph (b)(1) of this section, including:
    - (a) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
    - (b) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - vii. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- b. These requirements apply to the owner or operator of an affected source using an afterburner to comply with the requirements of this subpart.
- i. The owner or operator must install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements for continuous monitoring systems in subpart A of this part.
  - ii. The temperature monitoring device must meet each of these performance and equipment specifications:
    - (a) The temperature monitoring device must be installed at the exit of the combustion zone of each afterburner.
      - (i) The monitoring system must record the temperature in 15-minute block averages and determine and record the average temperature for each 3-hour block period.
      - (ii) The recorder response range must include zero and 1.5 times the average temperature established according to the requirements in Sec. 63.1512(m).
      - (iii) The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer



**J & J****PTI /**

Emissions Unit ID: P002

**Issued: To be entered upon final issuance**

- ii. The owner or operator must continue to use the original monitoring requirement until necessary data are submitted and approval is received to use another monitoring procedure.
- iii. The owner or operator shall submit the application for approval of alternate monitoring methods no later than the notification of the performance test. The application must contain the information specified in paragraphs (w)(3) (i) through (iii) of this section:
  - (a) Data or information justifying the request, such as the technical or economic infeasibility, or the impracticality of using the required approach;



- ii. The owner or operator may retain records on microfilm, computer disks, magnetic tape, or microfiche; and
        - iii. The owner or operator may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
    - b. In addition to the general records required by Sec. 63.10(b), the owner or operator of a new or existing affected source (including an emission unit in a secondary aluminum processing unit) must maintain records of:
      - i. For each affected source with emissions controlled by an afterburner:
        - (a) Records of 15-minute block average afterburner operating temperature, including any period when the average temperature in any 3-hour block period falls below the compliant operating parameter value with a brief explanation of the cause of the excursion and the corrective action taken; and
        - (b) Records of annual afterburner inspections.
      - ii. Records for any approved alternative monitoring or test procedure.
      - iii. Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
        - (a) Startup, shutdown, and malfunction plan.
- 3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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## D. Reporting Requirements

### 1. [40 CFR Part 63 Subpart RRR Section 1515]

- a. Initial notifications. The owner or operator must submit initial notifications to the applicable permitting authority as described in paragraphs (a)(1) through (7) of this section.
  - i. As required by Sec. 63.9(b)(1), the owner or operator must provide notification for an area source that subsequently increases its emissions such that the source is a major source subject to the standard.
  - ii. As required by Sec. 63.9(b)(3), the owner or operator of a new or reconstructed affected source, or a source that has been reconstructed such that it is an affected source, that has an initial startup after the effective date of this subpart and for which an application for approval of construction or reconstruction is not required under Sec. 63.5(d), must provide notification that the source is subject to the standard.
  - iii. As required by Sec. 63.9(b)(4), the owner or operator of a new or reconstructed major affected source that has an initial startup after the effective date of this subpart and for which an application for approval of construction or reconstruction is required by Sec. 63.5(d) must provide the following notifications:
    - (a) Intention to construct a new major affected source, reconstruct a major source, or reconstruct a major source such that the source becomes a major affected source;
    - (b) Date when construction or reconstruction was commenced (submitted simultaneously with the application for approval of construction or reconstruction if construction or reconstruction was commenced before the effective date of this subpart, or no later than 30 days after the date construction or reconstruction commenced if construction or reconstruction commenced after the effective date of this subpart);
    - (c) Anticipated date of startup; and
    - (d) Actual date of startup.
  - iv. As required by Sec. 63.9(b)(5), after the effective date of this subpart, an owner or

Emissions Unit ID: P002

operator who intends to construct a new affected source or reconstruct an affected source subject to this subpart, or reconstruct a source such that it becomes an affected source subject to this subpart, must provide notification of the intended construction or reconstruction. The notification must include all the information required for an application for approval of construction or reconstruction as required by Sec. 63.5(d). For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements.

- (a) The application must be submitted as soon as practicable before the construction or reconstruction is planned to commence (but no sooner than the effective date) if the construction or reconstruction commences after the effective date of this subpart; or
    - (b) The application must be submitted as soon as practicable before startup but no later than 90 days after the effective date of this subpart if the construction or reconstruction had commenced and initial startup had not occurred before the effective date.
  - v. As required by Sec. 63.9(d), the owner or operator must provide notification of any special compliance obligations for a new source.
  - vi. As required by Sec. 63.9(e) and (f), the owner or operator must provide notification of the anticipated date for conducting performance tests and visible emission observations. The owner or operator must notify the Administrator of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.
  - vii. As required by Sec. 63.9(g), the owner or operator must provide additional notifications for sources with continuous emission monitoring systems or continuous opacity monitoring systems.
- b. Notification of compliance status report. Each owner or operator must submit a notification of compliance status report within 60 days after the compliance dates specified in Sec. 63.1501. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in paragraphs (b)(1) through (3) of this section. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. In a State with an approved operating permit program where delegation of authority under section 112(l) of the CAA has not been requested or approved, the owner or operator must provide duplicate notification to the applicable Regional Administrator. If an owner or operator submits the information specified in this section at different times or in different

**J & J****PTI /**

Emissions Unit ID: P002

**Issued: To be entered upon final issuance**

submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:

- i. Manufacturer's specification or analysis documenting the design residence time of no less than 2 seconds and design operating temperature of no less than 1600 deg. F for each afterburner used to control emissions from a sweat furnace that is not subject to a performance test.
- ii. Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
- iii. Startup, shutdown, and malfunction plan, with revisions.

2. [40 CFR Part 63 Subpart RRR Section 1516]
  - a. Startup, shutdown, and malfunction plan/reports. The owner or operator must develop and implement a written plan as described in Sec. 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The owner or operator shall also keep records of each event as required by Sec. 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in Sec. 63.6(e)(3). In addition to the information required in Sec. 63.6(e)(3), the plan must include:
    - i. Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
    - ii. Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
  - b. Excess emissions/summary report. As required by Sec. 63.10(e)(3), the owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in Sec. 63.10(c). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period.
    - i. A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - ii. An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
    - iii. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in Sec. 63.6(e)(3).
    - iv. An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency)

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PTI

Emissions Unit ID: P002

**Issued: To be entered upon final issuance**

by January 31 and July 31 of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

1. Emission Limitation:  
0.80 nanogram (ng) of D/F TEQ per dscm ( $3.5 \times 10^{-10}$  gr per dscf) at 11 percent oxygen (O<sub>2</sub>)

Applicable Compliance Method:

Compliance shall be demonstrated by the Monitoring and Recordkeeping requirements contained in Section C of this permit. A performance test is not required provided that the owner or operator operates and maintains an afterburner with a design residence time of 0.8 seconds or greater and an operating temperature of 1600 deg.F or greater.

2. Emission Limitation:

20% opacity as a six-minute average

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

3. Emission Limitation:

4.38 tons particulate emissions per year

Applicable Compliance Method:

Compliance shall be determined using the following equation:

$$E = EF * \text{hr/yr} * 0.0005 \text{ ton/lb} = \text{TPY}$$

Where:

EF = 0.540 lb/hr - This emission factor is based upon performance testing of a similar emission unit provided by the applicant.

**F. Miscellaneous Requirements**

22

**J & J Cores**

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**Issue**

**Facility ID: 0616000204**

Emissions Unit ID: P002

None