State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
COSHOCTON COUNTY
Application No: 06-05425

DATE: 8/12/2003

GE Electromaterials
Dean Talbot
1350 S Second St
Coshocton, OH 43812-1979

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 of 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,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA SEDO

COSHOCTON COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **06-05425** FOR AN AIR CONTAMINANT SOURCE FOR
GE ELECTROMATERIALS

On 8/12/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **GE Electromaterials**, located at **1350 S Second St, Coshocton**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-05425:

AGO Administrative Modification to remove references to OAC 3745-31-05 limit as state enforceable only and delete sources not installed.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Kay Gilmer, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]

DRAFT MODIFICATION OF PERMIT TO INSTALL 06-05425

Application Number:	**06-05425**
APS Premise Number:	**0616010029**
Permit Fee:	**$ To be entered upon final issuance**
Name of Facility:	**GE Electromaterials**
Person to Contact:	**Dean Talbot**
Address:	**1350 S Second St** **Coshocton, OH 43812-1979**

Location of proposed air contaminant source(s) [emissions unit(s)]:
1350 S Second St
Coshocton, **OHIO**

Description of modification:
AGO Administrative Modification to remove references to OAC 3745-31-05 limit as state enforceable only and delete sources not installed.

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

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.

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 ninety (90) 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.

GE Electromaterials Facility ID: **0616010029**
PTI Application: 06-05425
Modification Issued: To be entered upon final issuance

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

The air contaminant emissions units listed below comprise the Permit to Install for **GE Electromaterials** located in **COSHOCTON** 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.

Ohio EPA Source Number	Source Identification Description
P154	Treater 1040 with oven
P154 Cont'd	T012
P156	
T003	
P156 Cont'd	

GE Electromaterials Facility ID: **0616010029**
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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
		(2) Gravity Tanks for TR 1040 GETEK Line		enforceable
(14) Resin hold tanks GETEK Line	Weight Hopper and Reactor 1 GETEK line		BAT Determination Install, operate, and maintain a total enclosure around the coating operation and vent the captured VOC emissions from the total enclosure to a control device during actual coating operations, according to 40 CFR 60.742(b)(2), that is at least 98 percent efficient, which constitutes BACT pursuant to 40 CFR 52.21 (j)92), with a compliance determination as specified in the section of this. Permit entitled additional terms and conditions, operational terms and conditions I. (A), II.(a)(C), III, IV. (A)(7-9), Federally	The owner or operator shall install, operate, and maintain a cover on each piece of affected coating mix preparation equipment and vent VOC emissions from the covered mix equipment to a control device that is at least 98 percent efficient, which constitutes BACT pursuant to 40 CFR 52.21, while

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
preparation of the coating is taking place within the vessel, according to 40 CFR 60.742 (c)(1). Compliance determination is specified in the section of this permit entitled additional terms and conditions, operational terms and conditions I. (A), II. (AA)(Cc), III., IV. (A)(7-9), Federally	enforceable. The owner or operator shall install, operate, and maintain a cover on each piece of affected coating mix preparation equipment and vent VOC emissions from the covered mix equipment to a control device that is at least 98 percent efficient, which constitutes BACT pursuant to 40 CFR 52.21, while preparation of the coating is taking place within the vessel, according to 40 CFR 60.742 (c)(1). Compliance determination is specified in the section of this permit entitled additional terms and conditions, operational terms and conditions I. (A), II. (AA)(Cc), III., IV. (A)(7-9),	Federally enforceable. The owner or operator shall install, operate, and maintain a cover on each piece of affected coating mix preparation equipment and vent VOC emissions from the covered mix equipment to a control device that is at least 98 percent efficient, which constitutes BACT pursuant to 40 CFR 52.21, while preparation of the coating is taking place within the vessel, according to 40 CFR 60.742 (c)(1). Compliance determination is specified in the section of this permit entitled additional terms and conditions, operational terms and conditions I. (A), II. (AA)(Cc), III., IV. (A)(7-9), Federally enforceable.	Applicable Federal & OAC Rules 3745-31-05 4 CFR Part 60 Subpart VVV 40 CFR 52.21 3745-31-10 through 20	3745-21-07 (G)(1) 3745-31-05 40 CFR Part 60 Subpart VVV 40 CFR 52.21 3745-31-10 Through 20 3745-21-07(D) 3745-31-05 40 CFR Part 60 Subpart VVV 40 CFR 52.21 3745-31-10

GE Electromaterials Facility ID: **0616010029**
PTI Application: 06-05425
Modification Issued: To be entered upon final issuance

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Through 20	07(D)			
3745-21-07 (G)(1) 3745-21-07(D)				
3745-31-05 40 CFR Part 60 Subpart VVV 40 CFR 52.21 3745-31-10 Through 20				
3745-21-				

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
		pursuant to 40 CFR 52.21 (j)(2), with a compliance determination as specified in the section of this permit entitled additional terms and conditions operational terms and conditions I.(A), II. (A)(C), III., IV. (A)(7-9), federally enforceable	5.04 pounds VOC/hr 1.10 TPY VOC*	
	Permit Allowable Mass Emissions and/or Control/Usage Requirements			
	1.55 pounds NO_x/hr, 6.79 TPY NO_x; 12.36 pounds VOC/hr as an average over 3 hours; 96.27 TPY VOC* 1.30 Pound CO/hr, 5.70 TPY CO	Less stringent than BACT 0.03 TPY VOC*, **	Less Stringent than BACT	
	Install, operate, and maintain a total enclosure around the coating operation and vent the captured VOC emissions from the total enclosure to a control device during actual coating operations, according to 40 CFR 60.742 (b)(2), that is at least 98 percent efficient, which constitutes BACT	Less stringent	0.8 TPY VOC*, ** Less stringent than BACT	

* The overall VOC emissions from the thermal oxidizers shall not exceed 17.40 pounds.hour and 97.93 TPY VOC.

** VOC emissions from tanks with TS M/L Resins are less than GETEK. GETEK represents worst case emissions for the project. Either GETEK or TS M/L products are produced on the treater at one time but the system is not capable of producing both simultaneously.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
VOC	97.93
NO_x	6.79
CO	5.70

* A new 10,000 gallon VOC storage tank is also being installed as part of this project; it's emissions are DeMinimis (<1 TPY) under OAC 3745-15-05.

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

Source Number	Source Description	NSPS Regulation (Subpart)
T003	Resin Hold Tanks (14)	VVV
P156	Weight Hopper and Reactor 1	VVV
T012	Gravity Tanks TR 1040 (GETEK)	VVV
P154	Treater 1040 with Oven	VVV

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

a. construction date (no later than 30 days after such date);
b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
c. actual start-up date (within 15 days after such date); and
d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and Ohio EPA, Southeast District Office
2195 Front Street
Logan, Ohio 43138

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 **Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138.**

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 **Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH, 43138.**

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

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

I. OPERATIONAL TERMS AND CONDITIONS

A. Federally Enforceable

1. The thermal incinerator shall be operated and maintained such that the control device efficiency (EE), determined using Equation (1) specified in 60.743 and the test methods and procedures specified in 60.745 (B) throught (g), is equal to or greater that 00.98, which has been determined to represent the Best Available Control Technology requirements pursuant to 40 CFR 52.21 (J)(2) and 40 CFR 52.21(J)(3). The permittee must monitor the thermal incinerators pursuant to the requirements of 40 CFR 60.744(e) and comply with the reporting and recordkeeping requirements of 40 CFR 60.747(d).

2. Each piece of coating mix preparation equipment shall be covered and vented to a control device meeting the control efficiency required in Paragraph 1 above while preparation of coating is taking place in the equipment.

B. State Enforceable

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for the emission units. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with the OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions units' exhaust systems, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the ISCST3 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum ground-level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Toluene

TLV (ug/m3): 188,000 ug/m^3

Maximum Hourly Emission Rate (lbs/hr): 46.6 pounds/hour

Predicted 1-hour Maximum off-site Ground-Level Concentration (ug/m^3): 803 ug/m^3

MAGLC (ug/m^3): 4,476 ug/m^3

Physical changes or changes in the method of operation of any emissions unit identified in this permit to install that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this potential noncompliance situation, prior to initiating any changes to any emissions unit identified in this permit to install, the permittee is required to conduct an evaluation as specified below to determine that the "Air Toxic Policy Provision" of this permit to install is still satisfied. Changes that can affect the "Air Toxic Policy Provision" include, but are not limited to, the following:

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the 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 any emissions unit identified in this permit to install or exhaust parameters specified in the permit to install application (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

d. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;

e. The permittee can continue to comply with the allowable emission limitations specified in this permit to install; and,

f. Prior to the change, the permittee conducts an evaluation pursuant to the Air Toxic Policy provision of this permit to install, determines that the changed emissions unit still satisfies the air toxic policy provision of this permit to install, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy Provision for the change.

For any change to any emissions unit identified in this permit to install or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

This provision is superseded upon the promulgation by US EPA of a National Emission Standard for Hazardous Air Pollutants (NESHAP) applicable to any of the operations addressed in this permit.

<u>Recordkeeping Requirements for the Air Toxic Policy Provision of this Permit to Install</u>

a. Background data that describes 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(s) still satisfies the Air Toxic Policy Provision of this permit to install; and

c. Where computer modeling is performed, a copy of the resulting computer model

runs that show the results of the evaluation of the air toxic policy provision of this permit to install for the change.

2. According to the Ohio EPA, Division of Drinking and Ground Waters, there shall be no cross connection between the proposed facilities and any public water supply.

II. MONITORING AND RECORDKEEPING REQUIREMENTS

A. As specified in 40 CFR 60.744 (e), the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when any emissions units, required by this permit to be vented to the incinerator, are in operation. Temperatures shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for the control equipment for each day when any emissions units, required by this permit to be vented to the incinerator, are in operation:

(1) A log of the downtime for all monitoring equipment;

(2) All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance; and,

(3) All 3-hour periods(during actual coating operations) during which average total enclosure monitor readings vary by 5 percent or more from the operating parameters established in the approved total enclosure monitoring plan, identified in II.C. of this permit.

B. The permittee shall collect and record the following information each month for all surface coatings and clean up material for the purpose of determining annual volatile organic compound (VOC) emissions:

(1) The company identification for each VOC containing coating and cleanup material employed;

(2) The number of gallons of each coating, including VOC containing cleanup material, employed;

(3) The VOC content of each coating, including cleanup material, in pounds per gallon;

and,

(4) The total controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons (i.e., calculated using the overall control efficiency from the most recent emissions test that demonstrated that the emissions unit was in compliance).

The requirements of this paragraph, II.B. are state-only enforceable and are not based on any federal requirement.

C. The permittee shall prepare a monitoring plan for the total enclosure in accordance with 40 CFR 60.744(h) and 400 CFR Part 64. The total enclosure monitoring plan shall be submitted to the Director for approval with the notification of anticipated start-up required by this permit and 40 CFR 60.7(a)(2).

D. The permittee shall maintain records of the total natural gas usage in the treater ovens and the thermal oxidizers to determine compliance with NO_x and CO emissions limits. The requirements of this paragraph, II.D, are state-only enforceable and are not based on any federal requirement.

III. REPORTING REQUIREMENTS

A. As specified in 40 CFR 60.747 (d)(4), the permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour periods (during actual coating operations) during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average combustion temperature of the thermal incinerator during the most recent emissions test that demonstrated the emissions unit was in compliance. If no reportable periods have occurred, the permittee shall submit semiannual statements clarifying this fact.

B. As specified in 40 CFR 60.747 (d)(6), the permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour periods (during actual coating operations) during which average total enclosure monitor readings vary by 5 percent or more from the operating parameters established in the approved total enclosure monitoring plan, identified in II.C. of this permit. If no reportable periods have occurred, the permittee shall submit semiannual statements clarifying this fact.

C. As specified in 40 CFR 60.747 (f), the permittee shall submit the following with the reports required under 40 CFR 60.747 (d), identified in III.A. and B. Above:

(1) all periods during actual mixing or coating operations when a required monitoring

device (if any) was malfunctioning or not operating; and,

(2) all periods during actual mixing or coating operations when the control device was malfunctioning or not operating.

IV. EMISSION TESTING REQUIREMENTS

A. Compliance with the allowable mass emissions for each emission unit in these terms and conditions shall be determined in accordance with the following method (s):

1a. <u>Emission Limitation (P154)</u>

1.55 Pounds/hour NO_x and 6.79 tons/year NO_x

1b. <u>Applicable Compliance Method</u>

Compliance with the above pounds/hour emission limitation for NO_x will be determined by the retention of records of natural gas usage and the one time calculation of maximum hourly natural gas usage multiplied by an AP-42 emission factor. The AP-42 emission factor used shall be 100 pounds/10^6 SCF from table 1.4-1, dated 2-98, for uncontrolled emissions of NO_x. For OEPA source number P154, the permittee will multiply the pound/hour emissions, calculated according to the above, by 8760 hour/year, the result, expressed as tons per year, shall be compared to the tons/year NO_x emission limit stated above.

2a. <u>Emission Limitation (P154)</u>

1.30 Pounds/hour and 5.70 tons/year CO

2b. <u>Applicable Compliance Method</u>

Compliance with the above pounds/hour emission limitation for CO will be determined by the retention of records of natural gas usage and the one time calculation of maximum hourly natural gas usage multiplied by an AP-42 emission factor. The AP-42 emission factor used shall be 84 pounds/10^6 SCF from table 1.4-1, dated 2-98, for uncontrolled emissions of CO. For OEPA source number P154, the permittee will multiply the pound/hour emissions, calculated according to the above, by 8760 hour/year, the result, expressed as tons per year, shall be compared to the tons/year CO emission limit stated above.

3a. <u>Emission Limitation (P154)</u>

Total enclosure vented to the thermal incineration at least 98 percent efficient; 17.400 pounds/hour and 97.93 tons/year VOC at outlet of the thermal incinerator.

3b. Applicable Compliance Method

The permittee shall conduct, or have conducted, emissions testing of the thermal incinerator in accordance with the following requirements:

1. The emission testing shall be conducted 2.5 years after permit issuance and within 6 months prior to permit renewal.

2. The emission testing shall be conducted to demonstrated compliance with the pound VOC/hour emissions limit and 98 percent control efficiency. Compliance with the ton VOC/year emissions limit shall be demonstrated by multiplying the pound VOC/hour emissions, as determined from the emissions testing, by 8760 hours per year/2000 pounds per ton.

3. The following test methods shall be employed to demonstrate compliance with the allowable VOC mass emission rates: Method 25 or 25A as specified in 40 CFR 60, Subpart VVV, 60.745(b) through (g) Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

4. The 98 percent control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR, Subpart VVV, 60.743(b)(2). The test methods and procedures selected shall be based on a consideration of the diversity of the organic specifies present and their total concentration, and on a consideration of the potential presence of interfering gases.

5. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test date (s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and

the person (s) who will be conducting the test. Failure to submit such notification for review and approval prior to the test (s) may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission test.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the test, 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 shall be signed by the persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the test. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

Total enclosure shall be determined using Method 204, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of total enclosure. 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.

4a. <u>Emission Limitation (Associated Coating Mix Preparation Equipment) T003, P156, T012</u>

Install, operate and maintain a cover on each piece of affected coating mix preparation equipment and vent VOC emissions from the covered mix equipment to a 98 percent efficient control device while preparation of the coating is taking place within the vessel.

Pound VOC/hour and ton VOC/year emission limits as specified in the Air Emission Summary of this permit for each associated coating mix preparation equipment.

4b. <u>Applicable Compliance Method</u>

Compliance with the cover requirement shall be determined according to 40 CFR 60, Subpart VVV, 60.743(c).

Compliance with the individual VOC emission limits for all associated mix preparation equipment specified in 8a. Shall be determined by the emissions testing specified in 7b. The individual VOC emissions limits for all associated mix

preparation equipment specified in 8a. Shall be considered met if the limits specified in 7a. Are met.