

Synthetic Minor Determination and/or  Netting Determination

Permit To Install ~~06-07626~~

**A. Source Description**

The facility has submitted this PTI application for a proposed modification to the bottle forming process associated with Furnace A. In the current configuration, molten glass from Furnace A is distributed through a refiner followed by four parallel bottle forming lines. The facility is proposing to replace the existing refiner with a new refiner (P019), and to replace the existing four bottle forming lines with two new bottle forming lines (P020, P021). The capacity of each of the two new lines will increase such that the combined capacity of the two new lines will equal the combined capacity of the existing four lines.

**B. Facility Emissions and Attainment Status**

Owens Brockway Glass Plant 12 is a glass container manufacturing facility located in Zanesville, Muskingum County. Muskingum County is currently in attainment for all criteria pollutants. Owens Brockway is a Title V facility with a PTE over the 100 TPY threshold for PE and SO<sub>2</sub>, and a PTE over the 250 TPY PSD threshold for NO<sub>x</sub>.

**C. Source Emissions**

Proposed potential emissions of PM-10 from the installation of the new refiner, forehearths, bottle forming machines, and annealing lehrs are 18.63 TPY. Because the proposed emissions are over the 15 TPY PM-10 PSD emission threshold, a netting analysis that includes the effect on emissions of removing the replaced equipment has been performed to determine if further PSD review is needed. The following is a summary of the net effect on PM-10 emissions resulting from replacement of the existing A bottle forming lines:

<u>Pollutant</u>	<u>Proposed Emissions Units P019, P020, and P021</u>	<u>Existing Sources Z018-21, Z027-30, Z035, and Z037-40</u>	<u>Average Net Increase</u>
PM-10	18.63 TPY	6.51 TPY	+ 12.12 TPY

The net increase of 12.12 TPY in PM-10 emissions from the proposed project does not trigger the PSD thresholds, and therefore PSD review is not required.

**D. Conclusion**

With the increase in emissions from the proposed sources and the removal of the existing bottle forming lines there is a net increase in PM-10 emissions of 12.12 TPY. This modification results in an increase in emissions of less than PSD significance levels. Since the net increase in allowable emissions will be less than the PSD significance levels, the source has netted out of the PSD review requirement.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
MUSKINGUM COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No:** 06-07626  
**Fac ID:** 0660010007

**DATE:** 12/14/2004

Owens Brockway Glass Plant 12  
Jeffrey Cathcart  
1700 State St.  
Zanesville, OH 43701

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 **\$600** 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.

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

SEDO

WV

**MUSKINGUM COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07626 FOR AN AIR CONTAMINANT SOURCE FOR  
Owens Brockway Glass Plant 12**

On 12/14/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Owens Brockway Glass Plant 12**, located at **1700 State St., Zanesville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07626:

**Changes being made to the A line.**

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]



**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 06-07626**

Application Number: 06-07626  
Facility ID: 0660010007  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Owens Brockway Glass Plant 12  
Person to Contact: Jeffrey Cathcart  
Address: 1700 State St.  
Zanesville, OH 43701

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1700 State St.  
Zanesville, Ohio**

Description of proposed emissions unit(s):

**Changes being made to the A line.**

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

Director

Owens Brockway Glass Plant 12

Facility ID: 0660010007

PTI Application: 06-07626

Issued: To be entered upon final issuance

**Part I - GENERAL TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## **4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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## 6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## 7. 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.

## 8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## 9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

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applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## 10. Permit To Operate Application

- 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

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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 ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. 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.

#### **12. 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.

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**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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. 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.

**4. 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

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

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.

**5. Construction of New Sources(s)**

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

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

**6. 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.

**7. 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).

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

**Owens Brockway Glass Plant 12**

**Facility ID: 0660010007**

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

if applicable) 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.

Owens Brockway Glass Plant 12  
 PTI Application: 06-07626

Emissions Unit ID: P019  
 Facility ID: 0660010007

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

9. **Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

**C. 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>
PM-10	18.48
NOx	7.77
CO	6.53

Owen

PTI A

Emissions Unit ID: P019

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

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None.

Owen  
PTI A

Emissions Unit ID: P019

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P019 - Refiner A	OAC rule 3745-31-05(A)(3)	Emissions shall not exceed:  0.45 pound per hour (lb/hr) and 1.99 TPY nitrogen oxides (NOx); and  0.38 lb/hr and 1.67 TPY carbon monoxide (CO).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-23-06(B).
	OAC rule 3745-23-06(B)	See Section A.I.2.b below.

**2. Additional Terms and Conditions**

- 2.a The hourly and annual emissions limitations were established to reflect the potential to emit of this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c Installation and operation of the emissions units included in this PTI (P019, P020, and P021) is contingent upon the permanent shutdown of the following sources: Line A

Owen

PTI A

Emissions Unit ID: P019

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

Refiner (Z035); Line A Forehearths (Z037, Z038, Z039, and Z040); Line A Swabbing (Z018, Z019, Z020, and Z021); and Line A Lehrs (Z027, Z028, Z029, Z030). The net change in emissions as a result of this equipment shutdown and installation is as follows:

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

<u>Pollutant</u>	<u>Proposed Emissions Units P019, P020, and P021</u>	<u>Existing Sources Z018-21, Z027-30, Z035, and Z037-40*</u>	<u>Net Increase</u>
PM-10	18.63 TPY	6.51 TPY	+12.12 TPY

\* Based upon the actual average emissions emitted during the years 2002 and 2003.

As a result of the net change in emissions, the proposed new source installation is not a major modification and the permittee has "netted out" of Federal Prevention of Significant Deterioration requirements.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

1. Prior to startup of emissions units P019, P020, and P021, the permittee shall submit a report documenting the shutdown dates for Z018-21, Z027-30, Z035, and Z037-40.

**V. Testing Requirements**

1. Compliance with the emissions limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions Limitation:  
Emissions shall not exceed 0.45 lb/hr and 1.99 TPY NO<sub>x</sub>.  
Applicable Compliance Method:  
Compliance with the hourly emission limitation shall be determined by multiplying the emission factor of 0.098 lb NO<sub>x</sub>/million Btu (AP-42 Table 1.4-1, 07/98) by the maximum burner rating of the refiner (4.63 million Btu/hr).

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton.

**Owens Brockway Glass Plant 12**  
**PTI A**  
**Issued**

**Facility ID: 0660010007**

Emissions Unit ID: P019

- b. Emissions Limitation:  
Emissions shall not exceed 0.38 lb/hr and 1.67 TPY CO.

**Owens Brockway Glass Plant 12**  
**PTI A**  
**Issued**

**Facility ID: 0660010007**

Emissions Unit ID: P019

**Applicable Compliance Method:**

Compliance with the hourly emission limitation shall be determined by multiplying the emission factor of 0.082 lb CO/million Btu (AP-42 Table 1.4-1, 07/98) by the maximum burner rating of the refiner (4.63 million Btu/hr).

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton.

**VI. Miscellaneous Requirements**

None.

Owen

PTI A

Emissions Unit ID: P019

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. 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>
P019 - Refiner A		

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

Owen  
PTI A

Emissions Unit ID: P020

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
P020 - Bottle forming line A1, including forehearth, swabbing operation, and annealing Lehr	OAC rule 3745-31-05(A)(3)	Emissions shall not exceed:  2.11 pounds per hour (lbs/hr) and 9.24 TPY PM-10;  0.66 lb/hr and 2.89 TPY nitrogen oxides (NOx); and  0.55 lb/hr and 2.43 TPY carbon monoxide (CO).
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-23-06(B).  Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	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 3745-23-06(B)	See Section A.I.2.b below.

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The hourly and annual emissions limitations were established to reflect the potential to emit of this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** Installation and operation of the emissions units included in this PTI (P019, P020, and P021) is contingent upon the permanent shutdown of the following sources: Line A Refiner (Z035); Line A Forehearths (Z037, Z038, Z039, and Z040); Line A Swabbing (Z018, Z019, Z020, and Z021); and Line A Lehrs (Z027, Z028, Z029, Z030). The net change in emissions as a result of this equipment shutdown and installation is as follows:

<u>Pollutant</u>	<u>Proposed Emissions</u>	<u>Existing Sources</u>	<u>Net</u>
	<u>Units P019,</u> <u>P020, and P021</u>	<u>Z018-21, Z027-30,</u> <u>Z035, and Z037-40*</u>	<u>Increase</u>
PM-10	18.63 TPY	6.51 TPY	+12.12 TPY

\* Based upon the actual average emissions emitted during the years 2002 and 2003.

As a result of the net change in emissions, the proposed new source installation is not a major modification and the permittee has "netted out" of Federal Prevention of Significant Deterioration requirements.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

1. 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 building egress points (Robertson Ventilator) 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 location and color of the emissions;

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- 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

#### **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the building egress points (Robertson Ventilator) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. Prior to startup of emissions units P019, P020, and P021, the permittee shall submit a report documenting the shutdown dates for Z018-21, Z027-30, Z035, and Z037-40.

#### **V. Testing Requirements**

1. Compliance with the emissions limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:  
Emissions shall not exceed 2.11 lbs/hr and 9.24 TPY PM-10.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following one-time calculation based on the emissions factor in AP-42 Section 1.4 (7/98) and the company-supplied emission factor of 1 lb PM-10/lb swabbing material used:

$$\begin{aligned}
 \text{PM-10 allowable lb/hr} &= \text{Forehearth A1} + \text{Forming Machine A1} + \text{Annealing Lehr A1} \\
 &= [(\text{PM-10 EF})(\text{Max forehearth burner rating}) + (\text{PM-10 EF})(\text{Max swabbing material usage}) + (\text{PM-10 EF})(\text{Max annealing lehr burner rating})] \\
 &= [(0.0075 \text{ lb/million Btu})(2.736 \text{ million Btu/hr}) + (1 \text{ lb/lb swabbing material})(2.06 \text{ lbs swabbing material/hr}) + (0.0075 \text{ lb/million Btu})(4.0 \text{ million Btu/hr})]
 \end{aligned}$$

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= 2.11 lb PM-10/hr

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton.

- b. Emissions Limitation:  
Emissions shall not exceed 0.66 lb/hr and 2.89 TPY NO<sub>x</sub>.

## Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following one-time calculation based on the emission factor in AP-42 Section 1.4 (7/98):

$$\begin{aligned} \text{NO}_x \text{ allowable lb/hr} &= \text{Forehearth A1} + \text{Annealing Lehr A1} \\ &= [(\text{NO}_x \text{ EF})(\text{Max forehearth burner rating}) + (\text{NO}_x \text{ EF})(\text{Max annealing Lehr burner rating})] \\ &= [(0.098 \text{ lb/million Btu})(2.736 \text{ million Btu/hr}) + (0.098 \text{ lb/million Btu})(4.0 \text{ million Btu/hr})] \\ &= 0.66 \text{ lb NO}_x/\text{hr} \end{aligned}$$

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton.

- c. Emissions Limitation:  
Emissions shall not exceed 0.55 lb/hr and 2.43 TPY CO.

## Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following one-time calculation based on the emission factor in AP-42 Section 1.4 (7/98):

$$\begin{aligned} \text{CO allowable lb/hr} &= \text{Forehearth A1} + \text{Annealing Lehr A1} \\ &= [(\text{CO EF})(\text{Max forehearth burner rating}) + (\text{CO EF})(\text{Max annealing Lehr burner rating})] \\ &= [(0.082 \text{ lb/million Btu})(2.736 \text{ million Btu/hr}) + (0.082 \text{ lb/million Btu})(4.0 \text{ million Btu/hr})] \\ &= 0.55 \text{ lb CO/hr} \end{aligned}$$

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton.

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**Issued**

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- d. Emissions Limitation:  
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

**VI. Miscellaneous Requirements**

None.

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**B. State Only Enforceable Section**

**I. 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>
P020 - Bottle forming line A1, including forehearth, swabbing operation, and annealing Lehr		

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

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

Emissions Unit ID: P020

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Emissions Unit ID: P021

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
P021 - Bottle forming line A2, including forehearth, swabbing operation, and annealing Lehr	OAC rule 3745-31-05(A)(3)	Emissions shall not exceed:  2.11 pounds per hour (lbs/hr) and 9.24 TPY PM-10;  0.66 lb/hr and 2.89 TPY nitrogen oxides (NOx); and  0.55 lb/hr and 2.43 TPY carbon monoxide (CO).
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-23-06(B).  Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	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 3745-23-06(B)	See Section A.I.2.b below.

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The hourly and annual emissions limitations were established to reflect the potential to emit of this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.b** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** Installation and operation of the emissions units included in this PTI (P019, P020, and P021) is contingent upon the permanent shutdown of the following sources: Line A Refiner (Z035); Line A Forehearths (Z037, Z038, Z039, and Z040); Line A Swabbing (Z018, Z019, Z020, and Z021); and Line A Lehrs (Z027, Z028, Z029, Z030). The net change in emissions as a result of this equipment shutdown and installation is as follows:

<u>Pollutant</u>	<u>Proposed Emissions</u>	<u>Existing Sources</u>	<u>Net</u>
	<u>Units P019,</u> <u>P020, and P021</u>	<u>Z018-21, Z027-30,</u> <u>Z035, and Z037-40*</u>	<u>Increase</u>
PM-10	18.63 TPY	6.51 TPY	+12.12 TPY

\* Based upon the actual average emissions emitted during the years 2002 and 2003.

As a result of the net change in emissions, the proposed new source installation is not a major modification and the permittee has "netted out" of Federal Prevention of Significant Deterioration requirements.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

1. 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 building egress points (Robertson Ventilator) 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 location and color of the emissions;

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- 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

#### **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the building egress points (Robertson Ventilator) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. Prior to startup of emissions units P019, P020, and P021, the permittee shall submit a report documenting the shutdown dates for Z018-21, Z027-30, Z035, and Z037-40.

#### **V. Testing Requirements**

1. Compliance with the emissions limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:  
Emissions shall not exceed 2.11 lbs /hr and 9.24 TPY PM-10.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following one-time calculation based on the emissions factor in AP-42 Section 1.4 (7/98) and the company-supplied emission factor of 1 lb PE/lb swabbing material used:

$$\begin{aligned}
 \text{PM-10 allowable lb/hr} &= \text{Forehearth A2} + \text{Forming Machine A2} + \text{Annealing Lehr A2} \\
 &= [(\text{PM-10 EF})(\text{Max forehearth burner rating}) + (\text{PM-10 EF})(\text{Max swabbing material usage}) + (\text{PM-10 EF})(\text{Max annealing lehr burner rating})] \\
 &= [(0.0075 \text{ lb/million Btu})(2.736 \text{ million Btu/hr}) + (1 \text{ lb/lb swabbing material})(2.06 \text{ lbs swabbing material/hr}) + (0.0075 \text{ lb/million Btu})(4.0 \text{ million Btu/hr})]
 \end{aligned}$$

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= 2.11 lb PM-10/hr

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton.

- b. Emissions Limitation:  
Emissions shall not exceed 0.66 lb/hr and 2.89 TPY NO<sub>x</sub>.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following one-time calculation based on the emission factor in AP-42 Section 1.4 (7/98):

$$\begin{aligned} \text{NO}_x \text{ allowable lb/hr} &= \text{Forehearth A2} + \text{Annealing Lehr A2} \\ &= [(\text{NO}_x \text{ EF})(\text{Max forehearth burner rating}) + (\text{NO}_x \text{ EF})(\text{Max annealing Lehr burner rating})] \\ &= [(0.098 \text{ lb/million Btu})(2.736 \text{ million Btu/hr}) + (0.098 \text{ lb/million Btu})(4.0 \text{ million Btu/hr})] \\ &= 0.66 \text{ lb NO}_x\text{/hr} \end{aligned}$$

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton.

- c. Emissions Limitation:  
Emissions shall not exceed 0.55 lb/hr and 2.43 TPY CO.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following one-time calculation based on the emission factor in AP-42 Section 1.4 (7/98):

$$\begin{aligned} \text{CO allowable lb/hr} &= \text{Forehearth A2} + \text{Annealing Lehr A2} \\ &= [(\text{CO EF})(\text{Max forehearth burner rating}) + (\text{CO EF})(\text{Max annealing Lehr burner rating})] \\ &= [(0.082 \text{ lb/million Btu})(2.736 \text{ million Btu/hr}) + (0.082 \text{ lb/million Btu})(4.0 \text{ million Btu/hr})] \\ &= 0.55 \text{ lb CO/hr} \end{aligned}$$

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton.

- d. Emissions Limitation:  
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

**VI. Miscellaneous Requirements**

None.

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PTI A

Emissions Unit ID: P021

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. 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>
P021 - Bottle forming line A2, including forehearth, swabbing operation, and annealing Lehr		

**2. Additional Terms and Conditions**

2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.