



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Scott J. Nally, Director

2/7/2013

Timothy Ewing  
 Sanoh America, Inc.  
 1849 Industrial Drive  
 P.O. Box 1626  
 Findlay, OH 45840-1626

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0332010063  
 Permit Number: P0112813  
 Permit Type: Renewal  
 County: Hancock

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

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

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Sanoh America, Inc.**

Facility ID:	0332010063
Permit Number:	P0112813
Permit Type:	Renewal
Issued:	2/7/2013
Effective:	2/7/2013
Expiration:	2/7/2023





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
Sanoh America, Inc.

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**Final Permit-to-Install and Operate**  
Sanoh America, Inc.  
**Permit Number:** P0112813  
**Facility ID:** 0332010063  
**Effective Date:** 2/7/2013

## Authorization

Facility ID: 0332010063  
Application Number(s): A0046305  
Permit Number: P0112813  
Permit Description: PTIO Renewal permit for two steel tubing coating lines and a brazing oven.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 2/7/2013  
Effective Date: 2/7/2013  
Expiration Date: 2/7/2023  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Sanoh America, Inc.  
1849 Industrial Drive  
P.O. Box 1626  
Findlay, OH 45840-1626

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

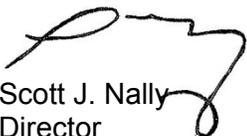
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



**Final Permit-to-Install and Operate**  
Sanoh America, Inc.  
**Permit Number:** P0112813  
**Facility ID:** 0332010063  
**Effective Date:** 2/7/2013

## Authorization (continued)

Permit Number: P0112813  
Permit Description: PTIO Renewal permit for two steel tubing coating lines and a brazing oven.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>K003</b>
Company Equipment ID:	Tubing Coating Line #1
Superseded Permit Number:	P0087067
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K004</b>
Company Equipment ID:	Tubing Coating Line #2
Superseded Permit Number:	P0087067
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	Braze Oven #2
Superseded Permit Number:	P0087067
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
SanoH America, Inc.  
**Permit Number:** P0112813  
**Facility ID:** 0332010063  
**Effective Date:** 2/7/2013

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
Sano America, Inc.  
**Permit Number:** P0112813  
**Facility ID:** 0332010063  
**Effective Date:** 2/7/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

Sanoh America, Inc.

**Permit Number:** P0112813

**Facility ID:** 0332010063

**Effective Date:** 2/7/2013

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None



**Final Permit-to-Install and Operate**  
Sanoh America, Inc.  
**Permit Number:** P0112813  
**Facility ID:** 0332010063  
**Effective Date:** 2/7/2013

## **C. Emissions Unit Terms and Conditions**



1. **K003, Tubing Coating Line #1**

**Operations, Property and/or Equipment Description:**

Tubing coating line with two 10 line primer line flow coaters, RF drying oven, topcoat flow coater, NG drying ovens and regenerative thermal oxidizer.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. e)(3), e)(4) and e)(5)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	1.78 lbs of volatile organic compounds (VOC)/hour; 7.80 tons of VOC/year  Use of a thermal oxidizer (see b)(2)a.)
b.	OAC rule 3745-21-09(B)(6)	See b)(2)b.

(2) **Additional Terms and Conditions**

a. "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be the use of a regenerative thermal oxidizer for control of VOC. The thermal oxidizer shall be designed and operated to achieve a minimum overall control efficiency of 95% (100% capture and 95% destruction efficiency).

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



- c) Operational Restrictions
  - (1) None
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each month:
    - a. The name and identification number of each primer, topcoat, and thinner employed;
    - b. The VOC content of each primer, topcoat, and thinner employed, in pounds per gallon;
    - c. The number of gallons of each primer, topcoat, and thinner employed;
    - d. The total controlled VOC emissions from all primers, topcoats, and thinners employed, in pounds, calculated by using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
    - e. The annual, year-to-date, VOC emissions from all primers, topcoats, and thinners (sum of d)(1)d. for each month to date from January to December).
  - (2) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable average combustion temperature within the thermal oxidizer for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.
  - (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:
    - a. all 3-hour blocks of time when the emissions unit controlled by the thermal oxidizer was in operation during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance; and



- b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit was in operation.

These records shall be maintained at the facility for a period of three years.

- (4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring



requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (5) The permit for emissions units K003 and K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the worst case pollutants:

Pollutant: Isophorone

TLV (mg/m<sup>3</sup>): 28

Maximum Hourly Emission Rate (lbs/hr): 1.23

Predicted 1-Hour Maximum Ground Level Concentration (ug/m<sup>3</sup>): 87.96

MAGLC (ug/m<sup>3</sup>): 491.33

Pollutant: Xylene

TLV (mg/m<sup>3</sup>): 434

Maximum Hourly Emission Rate (lbs/hr): 0.39

Predicted 1-Hour Maximum Ground Level Concentration (ug/m<sup>3</sup>): 27.89

MAGLC (ug/m<sup>3</sup>): 10,333.33

Pollutant: MIBK

TLV (mg/m<sup>3</sup>): 205

Maximum Hourly Emission Rate (lbs/hr): 0.47

Predicted 1-Hour Maximum Ground Level Concentration (ug/m<sup>3</sup>): 33.61

MAGLC (ug/m<sup>3</sup>): 4880.95

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the Air Toxic Policy will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the Air Toxic Policy include the following:

- a. Changes in the composition of the materials used (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 the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack temperature, etc.).

\* Only compounds/pollutants as identified in OAC rule 3745-114-01 at the time of the change will be subject to re-evaluation.

- (6) If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final PTIO prior to the change.
- (7) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the Air Toxic Policy:
  - a. A description of the parameters changed (composition of materials, new pollutant emitted, change in stack/exhaust parameters, etc.);
  - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
  - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand-delivered.
- (2) The permittee shall identify in the PER the following information concerning the operations of the thermal oxidizer during the 12-month reporting period:
  - a. Each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;



- b. Any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;
- c. Each incident of deviation described in “a” or “b” above where a prompt investigation was not conducted;
- d. Each incident of deviation described in “a” or “b” where prompt corrective action that would bring the emissions unit into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range was determined to be necessary and was not taken; and
- e. Each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.78 lbs of VOC/hour

Applicable Compliance Method

The hourly emission limitation represents the potential to emit of the emissions unit and was developed by applying an overall control efficiency of 95% to the following maximum usage rates and VOC contents of each primer, topcoat, and thinner:

NP-23H Primer: 0.46 gallon/hour @ 5.70 lbs of VOC/gallon  
Olive M Topcoat: 1.71 gallons/hour @ 5.26 lbs of VOC/gallon  
PA Primer: 0.34 gallon/hour @ 5.76 lbs of VOC/gallon  
Reducer: 2.85 gallons/hour @ 7.70 lbs of VOC/gallon

Compliance shall be demonstrated by the emission testing requirements in section f)(2).

- b. Emission Limitation  
7.80 tons of VOC/year

Applicable Compliance Method

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

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



- a. The emission testing shall be conducted approximately 2.5 years after permit issuance.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rate for VOC and the minimum overall control efficiency of 95% for VOC (100% capture and 95% destruction efficiency).
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:
  - i. VOC: Methods 1 – 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A  
  
Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - ii. The capture efficiency shall be determined using Methods 204 through 204F, 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 capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (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.)
  - iii. The 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emission limits and/or control requirements, unless otherwise specified or approved by the Northwest District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the test pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. The Intent to Test notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northwest District Office's refusal to accept the results of the test(s).



- f. Personnel from the Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northwest District Office.

g) **Miscellaneous Requirements**

- (1) This permit establishes federally enforceable limitations on VOC for the purpose of having the controlled VOC emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3) by requiring to have VOCs controlled by a regenerative thermal oxidizer with an overall control efficiency of 95% (100% capture and 95% destruction efficiency) and a maximum mass emission rate of 1.78 pounds per hour.



**2. K004, Tubing Coating Line #2**

**Operations, Property and/or Equipment Description:**

Tubing coating line with two 10 line flow coater, RF drying oven, and regenerative thermal oxidizer.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. e)(3), e)(4) and e)(5)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.84 lb of volatile organic compounds (VOC)/hour; 3.68 tons of VOC/year  Use of a thermal oxidizer (see b)(2)a.)
b.	OAC rule 3745-21-09(B)(6)	See b)(2)b.

(2) Additional Terms and Conditions

a. "Best Available Technology" (BAT) for this emissions unit has been determined to be the use of a regenerative thermal oxidizer for control of VOC. The thermal oxidizer shall be designed and operated to achieve a minimum overall control efficiency of 95% (100% capture and 95% destruction efficiency).

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None



d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month:
  - a. The name and identification number of each primer, topcoat, and thinner employed;
  - b. The VOC content of each primer, topcoat, and thinner employed, in pounds per gallon;
  - c. The number of gallons of each primer, topcoat, and thinner employed;
  - d. The total controlled VOC emissions from all primers, topcoats, and thinners employed, in pounds, calculated by using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance; and
  - e. The annual, year-to-date, VOC emissions from all primers, topcoats, and thinners (sum of d)(1)d. for each month to date from January to December).
- (2) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable average combustion temperature within the thermal oxidizer for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.
- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:
  - a. all 3-hour blocks of time when the emissions unit controlled by the thermal oxidizer was in operation during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit was in operation.



These records shall be maintained at the facility for a period of three years.

- (4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand-delivered.
- (2) The permittee shall identify in the PER the following information concerning the operations of the thermal oxidizer during the 12-month reporting period:
  - a. Each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
  - b. Any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;
  - c. Each incident of deviation described in "a" or "b" above where a prompt investigation was not conducted;
  - d. Each incident of deviation described in "a" or "b" where prompt corrective action that would bring the emissions unit into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range was determined to be necessary and was not taken; and
  - e. Each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.
- (3) The permit for emissions units K003 and K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the worst case pollutants:

Pollutant: Isophorone

TLV (mg/m<sup>3</sup>): 28

Maximum Hourly Emission Rate (lbs/hr): 1.23

Predicted 1-Hour Maximum Ground Level Concentration (ug/m<sup>3</sup>): 87.96

MAGLC (ug/m<sup>3</sup>): 491.33



Pollutant: Xylene  
TLV (mg/m3): 434  
Maximum Hourly Emission Rate (lbs/hr): 0.39  
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 27.89  
MAGLC (ug/m3): 10,333.33

Pollutant: MIBK  
TLV (mg/m3): 205  
Maximum Hourly Emission Rate (lbs/hr): 0.47  
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 33.61  
MAGLC (ug/m3): 4880.95

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the Air Toxic Policy will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the Air Toxic Policy include the following:

- a. Changes in the composition of the materials used (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 the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack temperature, etc.).

\* Only compounds/pollutants as identified in OAC rule 3745-114-01 at the time of the change will be subject to re-evaluation.

- (4) If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final PTIO prior to the change.



- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the Air Toxic Policy:
- a. A description of the parameters changed (composition of materials, new pollutant emitted, change in stack/exhaust parameters, etc.);
  - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
  - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation  
0.84 lbs of VOC/hour  
  
Applicable Compliance Method  
The hourly emission limitation represents the potential to emit of the emissions unit and was developed by applying an overall control efficiency of 95% to the following maximum usage rates and VOC contents of each primer, topcoat, and thinner:  
  
PA Primer: 1.25 gallon/hour @ 5.76 lbs of VOC/gallon  
Reducer: 1.25 gallons/hour @ 7.70 lbs of VOC/gallon  
  
Compliance shall be demonstrated by the emission testing requirements in section f)(2).
  - b. Emission Limitation  
3.68 tons of VOC/year  
  
Applicable Compliance Method  
The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.
- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted approximately 2.5 years after permit issuance.



- b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rate for VOC and the minimum overall control efficiency of 95% for VOC (100% capture and 95% destruction efficiency).
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:
  - i. VOC: Methods 1 – 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A  
  
Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - ii. The capture efficiency shall be determined using Methods 204 through 204F, 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 capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (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.)
  - iii. The 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emission limits and/or control requirements, unless otherwise specified or approved by the Northwest District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the test pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. The Intent to Test notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northwest District Office's refusal to accept the results of the test(s).
- f. Personnel from the Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information



necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment.

- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northwest District Office.

g) **Miscellaneous Requirements**

- (1) This permit establishes federally enforceable limitations on VOC for the purpose of having the controlled VOC emission rate represent the potential to emit of the emissions unit. This limitation shall be established through OAC rule 3745-31-05(A)(3) by requiring to have VOCs controlled by a regenerative thermal oxidizer with an overall control efficiency of 95% (100% capture and 95% destruction efficiency) and a maximum mass emission rate of 0.84 pound per hour.



**3. P007, Braze Oven #2**

**Operations, Property and/or Equipment Description:**

Brazing Oven for Metal Tubing (Electric) with Exothermic (Rx) Gas Generation

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	1.26 lbs of carbon monoxide (CO)/hour; 5.52 tons of CO/year
b.	OAC rule 3745-21-08(B)	See b)(2)a.

(2) Additional Terms and Conditions

a. The permittee has satisfied the “best available control techniques and operating practices” required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) None



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand-delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

1.26 lbs of CO/hour; 5.52 tons of CO/year

Applicable Compliance Method

The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\* The potential to emit is based on a maximum generation capacity of exothermic gas of 7,000 cubic feet per hour and a CO emission factor of 0.18 pound per 1000 cubic feet (based on in-house testing of a similar unit).

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1 – 4 and 10 of 40 CFR Part 60 Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

- (1) None