



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

06/11/08

CERTIFIED MAIL

**RE: Draft Title V Chapter 3745-77
permit**

03-02-02-0027
Joint Systems Manufacturing Center
Mark Lane
1155 Buckeye Road
Lima, OH 45804-1825

Dear Mark Lane:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

**Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
122 South Front Street
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Northwest District Office.

Sincerely,

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

cc: USEPA (electronically submitted)
File, DAPC PIER
Northwest District Office
Indiana



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 06/11/08	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 03-02-02-0027 to:
Joint Systems Manufacturing Center
1155 Buckeye Road
Lima, OH 45804-1825

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B003 (Coal Fired Boiler #4) 67.4 MMBtu/hr, coal fired	K006 (EFV and Cougar Paint Line) Wash, Clean, Prime, Top-Ext, Top-Int Booths and AMUs (PA-32, 33, 34, 35, 36)	Shotblast Media Airwash SB-5
B005 (Coal Fired Boiler #5) 93.8 MMBtu/hr, coal fired	P002 (Shotblast SB-5) Shotblast Unit (Tank Hull & Turret and Cougar Abrasive Blast)	P024 (Engine Hot Testing) Tank turbine engines fired by JP 8 jet kerosene, runs the engine with no load other than the transmission (changed from Z010)
B006 (Coal Fired Boiler #6) 62.5 MMBtu/hr, coal fired	P008 (Shotblast SB-6) Shotblast Unit (Tank Hull & Turret and Cougar Abrasive Blast)	P028 (Shotblast SB-13) Shotblast Unit (Tank Hull & Turret and Cougar Abrasive Blast)
B007 (Nat.Gas Fired Boiler #7) 73.0 MMBtu/hr, natural gas fired	P011 (Shotblast SB-7) Small Parts Shotblast	P029 (Shotblast SB-14) Shotblast Unit (Tank Hull & Turret and Cougar Abrasive Blast)
F002 (Misc. Welding / Grinding) Bldg.147 - welding/grinding	P014 (Shotblast w/ Baghouse) Shotblast w/ Baghouse	R001 (Service Garage Paint Booth) Bldg.317 - maintenance painting of forklifts, small machinery, etc., air powered spray guns or hand held spray cans
K001 (Structures Paint Line) Downdraft Spray Booth	P017 (Ash Convey System) Ash Convey System	R002 (Maintenance Paint Booth) Bldg.322 - maintenance painting of forklifts, small machinery, etc., air powered spray guns or hand held spray cans
K002 (Small Parts Paint Line) 3 Downdraft Spray Booths	P019 (Shotblast SB-9) Shotblast SB-9	
K003 (Final Paint Line) 2 Paint Spray Booths	P020 (Shotblast SB-10) Shotblast SB-10	
K004 (Paint Line PA-2) Downdraft Spray Booth	P023 (Shotblast Media Airwash SB-5)	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

Ohio Environmental Protection Agency

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided

in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office

or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

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.

(Authority for term: OAC rule 3745-77-07(A)(5))

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. 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.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

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.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. 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.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.

- 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
 - b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.
- (Authority for term: OAC rule 3745-77-07(F))*

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed

under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, 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.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. 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.

6. 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 emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

P009 - Flame Cut Plate Cutting;
P013 - Laser Cutting of GRP;
P016 - Portable Arc Welders and Grinders;
P025 - Air Make Up Unit Heater for Paint Spray Booth PA-1 (PTI No. 03-13949);
P026 - Air Make Up Unit Heater for Paint Spray Booth PA-2 (PTI No. 03-13949);
Z002 - Emergency Generators (4-diesel)
Z003 - Fire Pumps (2-diesel)
Z007 - Air Make Up Heater PA-10;
Z008 - Air Make Up Heater PA-11; and
Z009 - Air Make Up Heater PA-12

Each insignificant emissions unit at the facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and 3745-31.

[OAC rule 3745-77-07(A)(13)]

2. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units B003, B005, B006, K006, P002, P008, P011, P014, P017, P019, P020 and P023 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

(Authority for term: 40 CFR, Part 64)

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

F001 - Coal Conveying and Storage Piles;
P015 - Plasma Arc Punch Presses;
R001 - Service Garage Paint Booth;
R002 - Bldg. 322 Maintenance Paint Booth;
P903 - Welding School - Bldg. 147;
Z011 - Component and Final Assembly Solvent Cleaning;
Z012 - Gasoline and Diesel Fueling Operations;
Z022 - Miscellaneous Welding;
Z025 - Media Blast (Shot, SB-11);
Z026 - Lyons Mills;
Z027 - Pontiac Mill;
Z028 - Media Blast (Shot, SB-12);
Z029 - Media Blast (Shot);
Z030 - Plasma Arc Plate Cutting;
Z032 - Fuel Cell Insulating;
Z033 - Savage Saw (Aluminum Cut);
Z034 - Laser Metal Cutting;
Z035 - Water Jet Metal Cutting;
Z036 - Laser Cutting;
Z051 - Vehicle Emissions;
Z075 - Structures Vacuum Out;
Z096 - Gun Cleaners; and
Z097 - Touch Up Painting

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coal Fired Boiler #4 (B003)
Activity Description: 67.4 MMBtu/hr, coal fired

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
67.4 mmBtu/hr, coal-fired boiler #4, with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(C)(1)	0.225 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-08(I)	4.5 lbs sulfur dioxide emissions (SO ₂)/mmBtu of actual heat input
	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See Sections A.III. and A.IV.
	40 CFR 63.52(a)(2)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

II. Operational Restrictions

1. The quality of each shipment of coal received for burning in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.

[OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR, Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect a representative grab sample from each shipment of coal as received. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal.

Each sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isotherm Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the Director (the Ohio EPA, Northwest District Office).

[OAC rule 3745-77-07(C)(1)]

3. The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated sulfur dioxide emission rate, in lbs/mmBtu, for each shipment of coal during a calendar month.

[OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 2 to 20 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

5. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

6. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
- a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

7. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

8. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

9. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- filter bags;
 - timing boards and solenoid coils (for blow down function);
 - diaphragms and diaphragm seal kits;
 - spare set of belts; and
 - spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the Ohio EPA, Northwest District Office) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the Ohio EPA, Northwest District Office) documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from Sections A.III.2 and 3 above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

V. Testing Requirements

1. 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 within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for PE: Methods 1 - 5 of 40 CFR, Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

- 3.** Compliance Method Requirements: Compliance with the emission limitation(s) in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 3.a** Emission Limitation :
0.225 lb of PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1- 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

- 3.b** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

- 3.c** Emission Limitation:
4.5 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the limit of 4.5 lbs SO₂/mmBtu of actual heat input may be demonstrated based upon the record keeping requirements in Section A.III.2 and A.III.3 of this permit and the applicable equation in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation in accordance with Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

- 1.** The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
67.4 mmBtu/hr, coal-fired boiler #4, with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coal Fired Boiler #5 (B005)
Activity Description: 93.8 MMBtu/hr, coal fired

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
93.8 mmBtu/hr, coal-fired boiler #5, with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(C)(1)	See A.I.2.a.
	OAC rule 3745-18-08(A)	See A.I.2.a.
	OAC rule 3745-31-05(A)(3) (PTI No. 03-1167, issued 7/12/82)	1.6 lbs sulfur dioxide (SO ₂)/mmBtu of actual heat input
		0.62 lb nitrogen oxides (NO _x)/mmBtu of actual heat input
		0.03 lb PE/mmBtu of actual heat input
		0.08 lb carbon monoxide (CO)/mmBtu of actual heat input
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-08(B).
	OAC rule 3745-21-08(B)	See A.I.2.b.
	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See Sections A.III. and A.IV.
40 CFR 63.52(a)(2)	See A.I.2.c.	

2. Additional Terms and Conditions

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

2. Additional Terms and Conditions (continued)

- 2.b** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 03-1167.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

II. Operational Restrictions

1. The quality of each shipment of coal received for burning in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.

[OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR, Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect a representative grab sample from each shipment of coal as received. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal.

Each sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isotherm Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the Director (the Ohio EPA, Northwest District Office).

[OAC rule 3745-77-07(C)(1)]

3. The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated sulfur dioxide emission rate, in lbs/mmBtu, for each shipment of coal during a calendar month.

[OAC rule 3745-77-07(C)(1)]

4. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 2 to 20 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

5. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

6. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
- a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

7. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

8. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

9. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- a. filter bags;
 - b. timing boards and solenoid coils (for blow down function);
 - c. diaphragms and diaphragm seal kits;
 - d. spare set of belts; and
 - e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the Ohio EPA, Northwest District Office) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the Ohio EPA, Northwest District Office) documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from Sections A.III.2 and 3 above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), and 40 CFR, Part 64]

V. Testing Requirements

1. 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 within one year after issuance of this permit and within one year prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE, NOx and CO.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE - Methods 1 - 5 of 40 CFR, Part 60, Appendix A

NOx - Methods 1 - 4, and 7 of 40 CFR, Part 60, Appendix A

CO - Methods 1 - 4, and 10 of 40 CFR, Part 60, Appendix A

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test(s) shall be conducted with emissions units B005 and B006 being operated simultaneously.

[OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

3. Compliance Method Requirements: Compliance with the emission limitation(s) in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 3.a Emission Limitation:
0.03 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

- 3.b** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

- 3.c** Emission Limitation:
1.6 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the emission limit of 1.6 lbs SO₂/mmBtu of actual of actual heat input may be demonstrated based upon the record keeping requirements in Section A.III.2 and A.III.3 of this permit and the applicable equation in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation in accordance with Method 1 - 4, and 6 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

- 3.d** Emission Limitation:
0.62 lb NO_x/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 4, and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

- 3.e** Emission Limitation:
0.08 lb CO/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 4, and 10 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

1. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
93.8 mmBtu/hr, coal-fired boiler #5, with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coal Fired Boiler #6 (B006)
Activity Description: 62.5 MMBtu/hr, coal fired

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
62.5 mmBtu/hr, coal-fired boiler #6, with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(C)(1)	See A.I.2.a.
	OAC rule 3745-18-08(A)	See A.I.2.a.
	OAC rule 3745-31-05(A)(3) (PTI No. 03-1167, issued 7/12/82)	1.6 lbs sulfur dioxide (SO ₂)/mmBtu of actual heat input
		0.62 lb nitrogen oxides (NO _x)/mmBtu of actual heat input
		0.03 lb PE/mmBtu of actual heat input
		0.08 lb carbon monoxide (CO)/mmBtu of actual heat input
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-08(B).
	OAC rule 3745-21-08(B)	See A.I.2.b.
	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See Sections A.III. and A.IV.
40 CFR 63.52(a)(2)	See A.I.2.c.	

2. Additional Terms and Conditions

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

2. Additional Terms and Conditions (continued)

- 2.b** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 03-1167.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

II. Operational Restrictions

1. The quality of each shipment of coal received for burning in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.

[OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR, Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect a representative grab sample from each shipment of coal as received. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal.

Each sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isotherm Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the Director (the Ohio EPA, Northwest District Office).

[OAC rule 3745-77-07(C)(1)]

3. The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated sulfur dioxide emission rate, in lbs/mmBtu, for each shipment of coal during a calendar month.

[OAC rule 3745-77-07(C)(1)]

4. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 2 to 20 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

5. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

6. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
- a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

7. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

8. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

9. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- a. filter bags;
 - b. timing boards and solenoid coils (for blow down function);
 - c. diaphragms and diaphragm seal kits;
 - d. spare set of belts; and
 - e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the Ohio EPA, Northwest District Office) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the Ohio EPA, Northwest District Office) documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from Sections A.III.2 and 3 above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

V. Testing Requirements

1. 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 within one year after issuance of this permit and within one year prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE, NOx and CO.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE - Methods 1 - 5 of 40 CFR, Part 60, Appendix A

NOx - Methods 1 - 4, and 7 of 40 CFR, Part 60, Appendix A

CO - Methods 1 - 4, and 10 of 40 CFR, Part 60, Appendix A

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test(s) shall be conducted with emissions units B005 and B006 being operated simultaneously.

[OAC rule 3745-77-07(C)(1)]

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1)]

3. Compliance Method Requirements: Compliance with the emission limitation(s) in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 3.a Emission Limitation:
0.03 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

- 3.b** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

- 3.c** Emission Limitation:
1.6 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the emission limit of 1.6 lbs SO₂/mmBtu of actual of actual heat input may be demonstrated based upon the record keeping requirements in Section A.III.2 and A.III.3 of this permit and the applicable equation in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation in accordance with Method 1 - 4, and 6 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

- 3.d** Emission Limitation:
0.62 lb NO_x/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 4, and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

- 3.e** Emission Limitation:
0.08 lb CO/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 4, and 10 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

1. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
62.5 mmBtu/hr, coal-fired boiler #6, with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Nat.Gas Fired Boiler #7 (B007)
Activity Description: 73.0 MMBtu/hr, natural gas fired

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
73 mmBtu/hr, natural gas-fired boiler	OAC rule 3745-17-10(B)(1)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-31-05(A)(3) (PTI No. 03-7167, modified and issued 4/14/99)	0.1 lb nitrogen oxides (NOx)/mmBtu of actual heat input
		4.45 lbs carbon monoxide (CO)/mmBtu of actual heat input
		0.04 lb sulfur dioxide (SO ₂)/mmBtu of actual heat input
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-18-06(A) and 3745-17-10(B).
	40 CFR Part 60, Subpart Dc	Exempt (see A.I.2.c.)
	OAC rule 3745-18-06(A)	See A.I.2.a.
OAC rule 3745-21-08(B)	See A.I.2.b.	
40 CFR 63.52(a)(2)	See A.I.2.d.	

2. Additional Terms and Conditions

- OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

2. Additional Terms and Conditions (continued)

- 2.b** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 03-7167.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** This regulation does not specify emission limitations for units that fire only natural gas.

- 2.d** This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

[OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance Method Requirements: Compliance with the emission limitation(s) in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 1.a** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:

The permittee may demonstrate compliance with the lb PE/mmBtu allowable limitation above by multiplying an emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr), and then dividing by the maximum heat input rate of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1)]

- 1.c** Emission Limitations:
0.04 lb SO₂/mmBtu
0.1 lb NO_x/mmBtu
4.45 lbs CO/mmBtu

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitations above based upon multiplying the appropriate emission factor from USEPA's AP-42, Section 1.4 by the maximum natural gas burning capacity of the emissions unit (80,300 cu.ft/hr) and dividing by the maximum hourly heat input capacity of the emissions unit (73 mmBtu/hr).

Based on AP-42, 5th Edition (revised 7/98), the emission factors are as follows:

- a. for NO_x : 100 lbs/mm³cu.ft;
- b. for SO₂ : 0.6 lbs/mm³cu.ft; and
- c. for CO : 84 lbs/mm³cu.ft.

If required, the permittee shall demonstrate compliance with the emission limitations above based upon the following:

- a. for NO_x: Methods 1 - 4, and 7, 40 CFR, Part 60, Appendix A;
- b. for SO₂: Methods 1 - 4, and 6, 40 CFR, Part 60, Appendix A; and
- c. for CO: Methods 1 - 4, and 10, 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
73 mmBtu/hr, natural gas-fired boiler	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Misc. Welding / Grinding (F002)
Activity Description: Bldg.147 - welding/grinding

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
miscellaneous welding operations	OAC rule 3745-17-08(B)	none (See A.I.2.a.)
	OAC rule 3745-17-07(B)	none (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a This facility is not located within an area identified in "Appendix A" of OAC rule 3745-17-08 (it is located outside the City of Lima in Allen County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
miscellaneous welding operations	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Structures Paint Line (K001)
Activity Description: Downdraft Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
miscellaneous metal parts coating line with dry filtration system (PA-1)	OAC rule 3745-31-05(A)(3) (PTI No. 03-13953, issued 12/9/03)	35 lbs organic compounds (OC)/hr and 100.8 tons OC/yr from coating operations for emission units K001 and K004 combined
		3,440 lbs OC/month and 20.64 tons OC/yr from cleanup operations for emission units K001 and K004 combined
		3.00 lbs particulate emissions (PE)/hr and 8.64 tons PE/yr for emissions units K001 and K004 combined (See A.I.2.d.)
		Visible PE shall not exceed 0% opacity as a six-minute average
	See A.I.2.a.	
	OAC rule 3745-21-09(U)(1)(c)	Control Requirements (See A.I.2.c.) 3.5 lbs volatile organic compounds (VOC)/gallon minus water and exempt solvents for extreme performance coating (daily volume-weighted average)
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11 (B)	See A.I.2.b.

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.c** Best Available Technology (BAT) control requirements for this emissions unit has been determined to be use of a dry filtration system for control of PE, with a minimum control efficiency of 90 % for PE. BAT has also been determined to be compliance with the terms and conditions of this permit.
- 2.d** Particulate emissions are inclusive of and assumed to be less than 10 microns in size (PM10).

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC emission limitation specified above on an "as applied" basis.

[OAC rule 3745-77-07(A)(1)]

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI No. 03-13953]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K001:

- a. the company name and identification for each coating material employed;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
- c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

2. In addition to the monitoring and/or recordkeeping in section A.III.1 of this permit, the permittee shall maintain monthly records of the following information for emissions units K001 and K004 combined:

- a. the OC content of each coating, as applied, in lbs/gallon;
- b. the number of gallons of each coating employed;
- c. the OC emission rate for each coating, (sum of a x b for each coating employed), in lbs/month;
- d. the total OC emission rate for all coatings employed, (sum of c), in lbs/month; and
- e. the annual OC emissions, in tons, for all coatings employed (sum of d for each calendar month to date from January to December).

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall maintain monthly records of the following information for emissions units K001 and K004 combined:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed, in gallons;
 - c. the OC content of each cleanup material employed, in lbs/gallon;
 - d. the OC emissions rate from each cleanup material employed, in lbs/month (sum of b x c for each cleanup material employed);
 - e. the total OC emissions from cleanup materials employed, in lbs/month (sum of d), and;
 - f. the annual OC emissions, in tons, for all cleanup materials employed for emissions units K001 and K004 (sum of e for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons of cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from coating operations for emissions units K001 and K004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that summarize the total annual actual OC emissions from cleanup operations for emissions units K001 and K004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

1.a Emission Limitation:
35 lbs OC/hr from coating operations for emissions units K001 and K004 combined

Applicable Compliance Method:

The hourly emission limitation is based on the emission units potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on a maximum OC content of 3.5 lbs/gallon and a maximum hourly usage rate of 10 gallons/hr.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

1.b Emission Limitation:
100.8 tons OC/yr from coating operations for emission units K001 and K004 combined

Applicable Compliance Method:

This emission limitation was developed by multiplying a combined maximum lb OC/hr from emission units K001 and K004 (105 lbs/hr) by the maximum annual operating schedule of 1,920 hrs/yr* and dividing by 2,000 lbs/ton.

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2 of this permit.

*1,920 hrs/yr represents a maximum operating schedule based on an inherent physical limitation. The maximum hours of operation for emission units K001 and K004 is limited by the maximum production capacity of units at the facility.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

1.c Emission Limitation:
3,440 lbs OC/month from cleanup operations for emission units K001 and K004 combined

Applicable Compliance Method:

The monthly emission limitation is based on the emission units potential to emit*. Therefore, no monthly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on the combined maximum monthly cleanup material usage of 500 gallons/month for emission units K001 and K004, and a maximum OC content of 6.88 lbs OC/gallon.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

1.d Emission Limitation:
20.64 tons OC from cleanup operations for emission units K001 and K004 combined

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.3 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section A.III.1 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

- 1.f** Emission Limitation:
3.00 lbs PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$E \text{ (hourly)} = (\text{maximum coating solids content in lbs/gal}) (\text{maximum gallon usage rate}) \times (1 - TE) (1 - CE \text{ for dry filtration system})$

where:

$E \text{ (hourly)} = PE \text{ rate in lbs/hr}$

Maximum Coating Solids Content = 8.57 lbs/gal

Maximum Gallon Usage Rate = 10 gals/hr

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 65%)

CE = Control Efficiency of the control equipment (assumed to be 90.0%)

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with US EPA Methods 1-5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

- 1.g** Emission Limitation:
8.64 tons PE/yr from emission units K001 and K004 combined

Applicable Compliance Method:

This emission limitation was developed by multiplying a combined maximum lb PE/hr from emission units K001 and K004 (9.00 lbs/hr) by the maximum annual operating schedule of 1,920 hrs/yr* and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations for emissions units K001 and K004, compliance will also be shown with the annual limitation.

*1,920 hrs/yr represents a maximum operating schedule based on an inherent physical limitation. The maximum hours of operation for emission units K001 and K004 is limited by the maximum production capacity of units at the facility.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

- 1.h** Emission Limitation:
Visible PE shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with 40 CFR, Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

V. Testing Requirements (continued)

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings.
[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
miscellaneous metal parts coating line with dry filtration system (PA-1)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Small Parts Paint Line (K002)
Activity Description: 3 Downdraft Spray Booths

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
3 downdraft paint spray booths, with oven	OAC rule 3745-21-09(U)	3.5 pounds volatile organic compounds (VOC)/gallon coating, excluding water and exempt solvents
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(B)	0.551 lb PE/hr
	OAC rule 3745-31-05(A) (PTI No. 03-1196, issued 2/3/83)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-09(U), 3745-17-07(A) and 3745-17-11(B).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- Each coating employed in this emissions unit shall comply with the VOC emission limitation specified above on an "as applied" basis.
 [OAC rule 3745-77-07(A)(1)]
- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
 [OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

- 1.a Emission Limitation:
3.5 pounds VOC/gallon of coating (excluding water and exempt solvents)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[OAC rule 3745-77-07(C)(1)]

- 1.b Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{PE rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% considering 40 CFR, 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

- 2.** Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings.

[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
3 downdraft paint spray booths, with oven	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Final Paint Line (K003)
Activity Description: 2 Paint Spray Booths

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
final tank painting line (2 spray booths with bake oven)	OAC rule 3745-21-09(U)	3.5 pounds volatile organic compounds (VOC)/gallon coating, excluding water and exempt solvents
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(B)	0.551 lb PE/hr
	OAC rule 3745-31-05(A) (PTI No. 03-3558, issued 5/4/88)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-21-09(U), 3745-17-07(A) and 3745-17-11(B).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- Each coating employed in this emissions unit shall comply with the VOC emission limitation specified above on an "as applied" basis.
 [OAC rule 3745-77-07(A)(1)]
- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
 [OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

- 1.a Emission Limitation:
3.5 pounds VOC/gallon of coating (excluding water and exempt solvents)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

[OAC rule 3745-77-07(C)(1)]

- 1.b Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for the paint spraying operations:

$E = \text{PE rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% considering 40 CFR, 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

- 2.** Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings.

[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
final tank painting line (2 spray booths with bake oven)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Line PA-2 (K004)
Activity Description: Downdraft Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
miscellaneous metal parts coating line with dry filtration system (PA-2)	OAC rule 3745-31-05(A)(3) (PTI No. 03-13953, issued 12/9/03)	35 lbs organic compounds (OC)/hr and 100.8 tons OC/yr from coating operations for emission units K001 and K004 combined
		3,440 lbs OC/month and 20.64 tons OC/yr from cleanup operations for emission units K001 and K004 combined
		3.00 lbs particulate emissions (PE)/hr and 8.64 tons PE/yr for emissions units K001 and K004 combined (See A.I.2.d.)
		Visible PE shall not exceed 0% opacity as a six-minute average
	See A.I.2.a.	
	OAC rule 3745-21-09(U)(1)(c)	Control Requirements (See A.I.2.c.) 3.5 lbs volatile organic compounds (VOC)/gallon minus water and exempt solvents for extreme performance coating (daily volume-weighted average)
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11 (B)	See A.I.2.b.

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.c** Best Available Technology (BAT) control requirements for this emissions unit has been determined to be use of a dry filtration system for control of PE, with a minimum control efficiency of 90 % for PE. BAT has also been determined to be compliance with the terms and conditions of this permit.
- 2.d** Particulate emissions are inclusive of and assumed to be less than 10 microns in size (PM10).

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC emission limitation specified above on an "as applied" basis.

[OAC rule 3745-77-07(A)(1)]

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI No. 03-13953]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K004:

- a. the company name and identification for each coating material employed;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
- c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

2. In addition to the monitoring and/or recordkeeping in section A.III.1 of this permit, the permittee shall maintain monthly records of the following information for emissions units K001 and K004 combined:

- a. the OC content of each coating, as applied, in lbs/gallon;
- b. the number of gallons of each coating employed;
- c. the OC emission rate for each coating, (sum of a x b for each coating employed), in lbs/month;
- d. the total OC emission rate for all coatings employed, (sum of c), in lbs/month; and
- e. the annual OC emissions, in tons, for all coatings employed (sum of d for each calendar month to date from January to December).

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall maintain monthly records of the following information for emissions units K001 and K004 combined:
 - a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed, in gallons;
 - c. the OC content of each cleanup material employed, in lbs/gallon;
 - d. the OC emissions rate from each cleanup material employed, in lbs/month (sum of b x c for each cleanup material employed);
 - e. the total OC emissions from cleanup materials employed, in lbs/month (sum of d), and;
 - f. the annual OC emissions, in tons, for all cleanup materials employed for emissions units K001 and K004 (sum of e for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons of cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from coating operations for emissions units K001 and K004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that summarize the total annual actual OC emissions from cleanup operations for emissions units K001 and K004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

- 1.a Emission Limitation:
35 lbs OC/hr from coating operations for emissions units K001 and K004 combined

Applicable Compliance Method:

The hourly emission limitation is based on the emission units potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on a maximum OC content of 3.5 lbs/gallon and a maximum hourly usage rate of 10 gallons/hr.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

- 1.b Emission Limitation:
100.8 tons OC/yr from coating operations for emission units K001 and K004 combined

Applicable Compliance Method:

This emission limitation was developed by multiplying a combined maximum lb OC/hr from emission units K001 and K004 (105 lbs/hr) by the maximum annual operating schedule of 1,920 hrs/yr* and dividing by 2,000 lbs/ton.

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2 of this permit.

*1,920 hrs/yr represents a maximum operating schedule based on an inherent physical limitation. The maximum hours of operation for emission units K001 and K004 is limited by the maximum production capacity of units at the facility.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

- 1.c Emission Limitation:
3,440 lbs OC/month from cleanup operations for emission units K001 and K004 combined

Applicable Compliance Method:

The monthly emission limitation is based on the emission units potential to emit*. Therefore, no monthly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on the combined maximum monthly cleanup material usage of 500 gallons/month for emission units K001 and K004, and a maximum OC content of 6.88 lbs OC/gallon.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

- 1.d Emission Limitation:
20.64 tons OC from cleanup operations for emission units K001 and K004 combined

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.3 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average), for an extreme performance coating.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section A.III.1 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

- 1.f** Emission Limitation:
3.00 lbs PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly limitation by utilizing the following equation:

$E \text{ (hourly)} = (\text{maximum coating solids content in lbs/gal}) (\text{maximum gallon usage rate}) \times (1 - TE) (1 - CE \text{ for dry filtration system})$

where:

$E \text{ (hourly)} = PE \text{ rate in lbs/hr}$

Maximum Coating Solids Content = 8.57 lbs/gal

Maximum Gallon Usage Rate = 10 gals/hr

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 65%)

CE = Control Efficiency of the control equipment (assumed to be 90.0%)

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with U.S. EPA Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

- 1.g** Emission Limitation:
8.64 tons PE/yr from emission units K001 and K004 combined

Applicable Compliance Method:

This emission limitation was developed by multiplying a combined maximum lb PE/hr from emission units K001 and K004 (9.00 lbs/hr) by the maximum annual operating schedule of 1,920 hrs/yr* and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations for emissions units K001 and K004, compliance will also be shown with the annual limitation.

*1,920 hrs/yr represents a maximum operating schedule based on an inherent physical limitation. The maximum hours of operation for emission units K001 and K004 is limited by the maximum production capacity of units at the facility.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

- 1.h** Emission Limitation:
Visible PE shall not exceed 0% opacity as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with 40 CFR, Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-13953]

V. Testing Requirements (continued)

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings.
[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
miscellaneous metal parts coating line with dry filtration system (PA-2)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EFV and Cougar Paint Line (K006)

Activity Description: Wash, Clean, Prime, Top-Ext, Top-Int Booths and AMUs (PA-32, 33, 34, 35, 36)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
expeditionary fighting vehicle and cougar paint line with dry filtration system	OAC rule 3745-31-05(A)(3) (PTI No. 03-17347, issued 10/30/07)	172.02 lbs of organic compounds (OC) per hour; 58.18 tons of OC per year for wash solvent, coating and cleanup operations (See A.I.2.e.)
	OAC rule 3745-31-05(C)	40.52 tons of volatile organic compounds (VOC) per rolling 12-month period for wash solvent, coating and cleanup operations (See A.I.2.b.)
		0.40 ton of particulate matter 10 microns or less in size (PM10) per rolling 12-month period (See A.I.2.b.)
	ORC 3704.03(T)(4)	See A.I.2.a.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (See A.I.2.c.)
	OAC rule 3745-17-11(B)	0.551 lb of particulate emissions (PE) per hour (See A.I.2.d.)
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

- The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to particulate emissions (PE) from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pounds PE per hour from each coating booth operation under OAC rule 3745-17-11(B). All emissions of particulate matter are PM10 and, therefore, BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PM10 or PE.

2. Additional Terms and Conditions (continued)

- 2.b** PTI No. 03-17347 established the following federally enforceable emission limitations based on material usage restrictions for emissions unit K006 (see A.II.1 and A.II.2):
- i. 40.52 tons of VOC per rolling 12-month period
 - ii. 0.40 tons of PM10 per rolling 12-month period
- 2.c** The VOC content, excluding water and exempt solvents, restriction as contained in 3745-21-09(U)(1)(c) applies to all coatings employed in emissions unit K006.
- 2.d** The emission limitation of 0.551 lb PE per hour is applicable to each individual coating operation:
- i. 0.551 lb of PE per hour from prime booth operations;
 - ii. 0.551 lb of PE per hour from topcoat-exterior booth operations; and
 - iii. 0.551 lb of PE per hour from topcoat-interior booth operations.
- 2.e** The OC emission limitations involve organic compounds which do not participate in atmospheric photochemical reactions and, therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR, 51.100(s).
- 2.f** The hourly OC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The maximum rolling, 12-month quantity of materials containing VOC (wash solvent, coatings, cleanup materials, etc.) employed in emissions unit K006 shall be limited by the following equation:

$$\text{sum}[M=1,12] \{ \text{sum}[i=1,n][(V_i)(G_i)] \div 2000 \text{ lbs/ton} \} \leq 40.52$$

where,

M = the increment of the rolling, 12-month period;

V_i = VOC content in pounds per gallon of each material containing VOC (wash solvent, coatings, cleanup materials, etc.) employed;

G_i = gallons of each material containing VOC (wash solvent, coatings, cleanup materials, etc.) used during the rolling, 12-month period; and

n = total number of materials containing VOC (wash solvent, coatings, cleanup materials, etc.) employed in emissions unit K006.

[OAC rule 3745-77-07(A)(1) and PTI No. 03-17347]

II. Operational Restrictions (continued)

2. The maximum rolling, 12-month quantity of coatings applied resulting in PM10 emissions shall be limited by the following equation:

$$\sum[M=1,12] \{ \sum[i=1,n] [(V_i)(D_i)(S_i)(1 - T_i/100)(1 - C/100)] \} \div 2000 \text{ lbs/ton} \leq 0.40$$

where,

M = the increment of the rolling, 12-month period;

V_i = the volume, in gallons of each coating employed;

D_i = density in pounds per gallon of each coating (i.e., top coat, primer, etc.) employed;

S_i = solids content (percent by weight) of each coating (i.e., top coat, primer, etc.);

T_i = the percent transfer efficiency associated with each coating;

C = a control efficiency of 99% for use of dry filtration (capture efficiency = 100%); and

n = total number of coatings applied resulting in PM10 emissions (top coat, primer, etc.) employed in emissions unit K006.

[OAC rule 3745-77-07(A)(1) and PTI No. 03-17347]

3. The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI No. 03-17347]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain monthly records of the following OC/VOC information for emissions unit K006:
 - a. the name and identification number of each wash solvent, coating and cleanup material employed;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{voc,2}$];
 - c. the VOC content of each wash solvent, coating and cleanup material employed, in pounds per gallon, as applied;
 - d. the OC content of each wash solvent, coating and cleanup material employed, in pounds per gallon, as applied;
 - e. the volume, in gallons, of each wash solvent, coating and cleanup material employed;
 - f. the total VOC emissions, in tons, from all wash solvents, coatings and cleanup materials employed, prior to any credit claimed for solvent recycling [i.e., the summation of (c x e) for all coatings and cleanup materials, divided by 2000 lbs/ton];
 - g. the rolling, 12-month VOC emissions, in tons, from all the wash solvents, coatings and cleanup materials employed, prior to any credit claimed for solvent recycling;
 - h. the total OC emissions, in tons, from all wash solvents, coatings and cleanup materials employed, prior to any credit claimed for solvent recycling [i.e., the summation of (d x e) for all coatings and cleanup materials, divided by 2000 lbs/ton]; and
 - i. the annual, year-to-date, OC emissions from all wash solvents, coatings and cleanup operations, in tons per year (summation of h for each calendar month to date from January to December).

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

3. If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12-month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:
 - a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
 - b. the total amount of material collected and shipped for recycling/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
 - c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
 - d. the mass (lbs) of VOC to be credited to the rolling 12-month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit;
 - e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit for the materials shipped for recycling/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling, 12-month period; and
 - f. the rolling, 12-month of VOC emissions from the materials employed, after any credit claimed for solvent recycling.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall maintain monthly records of the following PM10 information for emissions unit K006:
- the name and identification number of each coating employed;
 - the density of each coating employed, in pounds per gallon (Di), as applied;
 - the solids content of each coating employed, in percent by weight (Si), as applied;
 - the volume, in gallons (Vi), of each coating employed;
 - the percent transfer efficiency (Ti) associated with each coating employed;
 - the calculated PM10 emissions from each coating employed using the following equation:
$$\text{PM10 emissions in lbs} = (Vi)(Di)(Si)(1 - Ti/100)(1 - C/100)$$

C = a control efficiency of 99% for use of dry filtration
 - the total PM10 emissions, in tons, from all coatings employed, [i.e., the summation of f for all coatings, divided by 2000 lbs/ton];
 - the rolling 12-month PM10 emissions, in tons, from all the coatings employed.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

5. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the dry filtration system controlling this emissions unit is observation of whether visible emissions occur during operation of the paint line. If visible emissions are observed greater than 20 percent opacity, as a six-minute average, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV. below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The dry filtration system shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the dry filtration system, including, but not limited to:
- dry filters; and
 - cartridge or frame parts that hold the dry filters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

7. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month VOC emission limitation of 40.52 tons; and
 - b. all exceedances of the rolling, 12-month PM10 emission limitation of 0.40 tons.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from wash solvents, coatings and cleanup operations. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

4. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

5. The permittee shall submit quarterly written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

V. Testing Requirements

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

- 1.a Emission Limitation:
40.52 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the rolling VOC emission limitation above shall be based upon the record keeping requirements specified in sections A.III.2 and A.III.3 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

- 1.b Emission Limitation:
3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents for an extreme performance coating.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be based upon the record keeping requirements specified in section A.III.2 for this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

V. Testing Requirements (continued)

1.c Emission Limitation:
172.02 pounds of OC per hour

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was based on the following worst case operating scenario for the paint line:

wash solvent: $0.86 \text{ lb OC/gal} \times 10.67 \text{ gal/hr} = 9.18 \text{ lbs OC/hr}$

primer coating: $2.84 \text{ lbs OC/gal} \times 6.67 \text{ gal/hr} = 18.94 \text{ lbs OC/hr}$

top coat (exterior): $5.18 \text{ lbs OC/gal} \times 4.0 \text{ gal/hr} = 20.72 \text{ lbs OC/hr}$

top coat (interior): $5.17 \text{ lbs OC/gal} \times 1.77 \text{ gal/hr} = 9.15 \text{ lbs OC/hr}$

non-skid: $2.95 \text{ lbs OC/gal} \times 3.67 \text{ gal/hr} = 10.83 \text{ lbs OC/hr}$

cleanup: $6.88 \text{ lbs OC/gal} \times 15 \text{ gal/hr} = 103.20 \text{ lbs OC/hr}$

$9.18 + 18.94 + 20.72 + 9.15 + 10.83 + 103.20 = 172.02 \text{ lbs OC/hr}$

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

1.d Emission Limitation:
58.18 tons of OC per year for wash solvent, coating and cleanup operations

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section A.III.2 and A.III.3 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
0.551 pound PE per hour (per individual coating operation)

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

$$(V_i)(D_i)(S_i)(1 - T_i/100)(1 - C/100)$$

where,

V_i = the volume, in gallons of each coating employed;

D_i = density in pounds per gallon of each coating (i.e., top coat, primer, etc.) employed

S_i = solids content (percent by weight) of each coating (i.e., top coat, primer, etc.)

T_i = the percent transfer efficiency associated with each coating

C = a control efficiency of 99% for use of dry filtration (capture efficiency = 100%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

- 1.f** Emission Limitation:
0.40 ton of PM10 per rolling, 12-month period

Applicable Compliance Method:

Compliance with the rolling PM10 emission limitation above shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

- 1.g** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible PE shall be determined in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

- 2.** Formulation data or U.S. EPA Method 24/24A, subsequent amendments to Methods 24/24A or other Ohio EPA approved methods shall be used to determine the OC/VOC content of materials.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17347]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
expeditionary fighting vehicle and cougar paint line with dry filtration system	OAC rule 3745-114-01	See B.III.1 through B.III.3
	ORC 3704.03(F)	See B.III.1. through B.III.3.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The Permit to Install (PTI) for this emissions unit (PTI No. 03-17347) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the PTI application, and modeling was performed for the toxic pollutant(s) emitted at over 1 ton per year using 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 (or other approved model) was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide # 70. The following summarizes the results of the modeling for the "worst-case" pollutant(s):

Pollutant: MIBK

TLV (mg/m3): 204,826.00

Maximum Hourly Emission Rate (lbs/hr): 36.95

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 514.30

MAGLC (ug/m3): 4,876.80

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the TLV previously modeled, as documented in the most recent version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - 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 diameter, etc.).
3. 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 PTI 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) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final PTI prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Shotblast SB-5 (P002)

Activity Description: Shotblast Unit (Tank Hull & Turret and Cougar Abrasive Blast)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
11.1 tons/hr shotblast unit, with baghouse (SB-5)	OAC rule 3745-31-05(C) (PTI No. 03-17360, modified and issued 1/29/08)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.01 grain per dry standard cubic foot (dscf) and 5.08 tons per year. Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-17-11(B)	See A.I.2.a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

2.a Permit to Install No. 03-17360 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. use of a baghouse achieving a maximum outlet concentration of 0.01 grain/dscf of particulate matter 10 microns or less in size (PM10)* and an associated 0% opacity, as a six-minute average

The potential to emit (PTE) for this emissions unit is 5.08 tons PM10/year. The annual PTE was determined by multiplying the maximum outlet concentration of 0.01 grain PM10/dscf by a maximum volumetric air flow of 25,000 acfm, applying the appropriate conversion factors of 7000 grains/lb, 1 dscf/1acfm, and 60 minutes/hr and multiplying the maximum operating schedule of 4745 hrs/yr (based on physical constraints) and dividing by 2000 lbs/ton.

*All particulate matter emissions are PM10.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1), PTI No. 03-17360 and 40 CFR, Part 64]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1), PTI No. 03-17360 and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

3. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
- a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:

- a. filter bags;
- b. timing boards and solenoid coils (for blow down function);
- c. diaphragms and diaphragm seal kits;
- d. spare set of belts; and
- e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), PTI No. 03-17360 and 40 CFR, Part 64]

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
0.01 grain PM10/dscf

Applicable Compliance Method:

The outlet concentration was established in accordance with the manufacturer's guaranteed fabric filter grain loading. If required, the permittee shall demonstrate compliance with the gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17360]

- 1.b Emission Limitation:
5.08 tons PM10/year

Applicable Compliance Method:

The annual PTE was determined by multiplying the maximum outlet concentration of 0.01 grain PM10/dscf by a maximum volumetric air flow of 25,000 acfm, applying the appropriate conversion factors of 7,000 grains/lb, 1 dscf/1acfm, and 60 minutes/hr; and multiplying by the maximum operating schedule of 4,745 hrs/yr and dividing by 2,000 lbs/ton.

Therefore, if compliance is shown with the grains PM10/dscf limitation, compliance with the annual limitation shall be assumed.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17360]

Facility Name: **Joint Systems Manufacturing Center**

Facility ID: **03-02-02-0027**

Emissions Unit: **Shotblast SB-5 (P002)**

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17360]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
11.1 tons/hr shotblast unit, with baghouse (SB-5)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Shotblast SB-6 (P008)

Activity Description: Shotblast Unit (Tank Hull & Turret and Cougar Abrasive Blast)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
13.5 tons/hr shotblast unit (SB-6), with baghouse	OAC rule 3745-31-05(C) (PTI No. 03-17360, modified and issued 1/29/08)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.001 grain per dry standard cubic foot (dscf) and 2.26 tons per year. Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-17-11(B)	See A.I.2.a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	40 CFR, Part 64 - Compliance Assurance Monitoring (CAM)	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

2.a Permit to Install No. 03-17360 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. use of a baghouse achieving a maximum outlet concentration of 0.001 grain/dscf of particulate matter 10 microns or less in size (PM10)* and an associated 0% opacity, as a six-minute average

The potential to emit (PTE) for this emissions unit is 2.26 tons PM10/year. The annual PTE was determined by multiplying the maximum outlet concentration of 0.001 grain PM10/dscf by a maximum volumetric air flow of 60,000 acfm, applying the appropriate conversion factors of 7000 grains/lb, 1 dscf/1acfm, and 60 minutes/hr; and multiplying by the maximum operating schedule of 8,760 hrs/yr and dividing by 2000 lbs/ton.

*All particulate matter emissions are PM10.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 1 to 8 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1), PTI No. 03-17360 and 40 CFR, Part 64]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

3. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
- a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- a. filter bags;
 - b. timing boards and solenoid coils (for blow down function);
 - c. diaphragms and diaphragm seal kits;
 - d. spare set of belts; and
 - e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), PTI No. 03-17360 and 40 CFR, Part 64]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
0.001 grain PM10/dscf

Applicable Compliance Method:

The outlet concentration was established in accordance with the manufacturer's guaranteed fabric filter grain loading. If required, the permittee shall demonstrate compliance with the gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17360]

- 1.b Emission Limitation:
2.26 tons PM10/year

Applicable Compliance Method:

The annual PTE was determined by multiplying the maximum outlet concentration of 0.001 grain PM10/dscf by a maximum volumetric air flow of 60,000 acfm, applying the appropriate conversion factors of 7,000 grains/lb, 1 dscf/1 acfm, and 60 minutes/hr; and multiplying by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton.

Therefore, if compliance is shown with the grains PM10/dscf limitation, compliance with the annual limitation shall be assumed.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17360]

Facility Name: **Joint Systems Manufacturing Center**

Facility ID: **03-02-02-0027**

Emissions Unit: **Shotblast SB-6 (P008)**

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-17360]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
13.5 tons/hr shotblast unit (SB-6), with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Shotblast SB-7 (P011)
Activity Description: Small Parts Shotblast

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
0.75 ton/hr shotblast unit (SB-7), with baghouse	OAC rule 3745-17-11(B)(1)	3.38 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) (PTI No. 03-1196, issued 2/3/83)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B).
	40 CFR, Part 64 - Compliance Assurance Monitoring	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV. below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

3. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- filter bags;
 - timing boards and solenoid coils (for blow down function);
 - diaphragms and diaphragm seal kits;
 - spare set of belts; and
 - spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
- each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):
- 1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation:
3.38 lbs PE/hour

Applicable Compliance Method:

The permittee may demonstrate compliance with the PE limitation above by multiplying a maximum outlet concentration of 0.03 grain PE/dscf* by the total maximum volumetric air flow rate (4,000 acfm), dividing by 7,000; and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
0.75 ton/hr shotblast unit (SB-7), with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Shotblast w/ Baghouse (P014)
Activity Description: Shotblast w/ Baghouse

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
shotblast unit (SB-8), with baghouse	OAC rule 3745-17-11(B)(1)	3.02 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) (PTI No. 03-1542, issued 1/25/84)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B).
	40 CFR, Part 64 - Compliance Assurance Monitoring	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 1 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

3. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- a. filter bags;
 - b. timing boards and solenoid coils (for blow down function);
 - c. diaphragms and diaphragm seal kits;
 - d. spare set of belts; and
 - e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
- a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):
- 1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation:
3.02 lbs PE/hour

Applicable Compliance Method:

The permittee may demonstrate compliance with the PE limitation above by multiplying a maximum outlet concentration of 0.03 grain PE/dscf* by the total maximum volumetric air flow rate (3,410 acfm), dividing by 7,000; and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
shotblast unit (SB-8), with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ash Convey System (P017)
Activity Description: Ash Convey System

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
pneumatic ash conveying and collection system, powerhouse ash system, with baghouse and wet suppression system	OAC rule 3745-31-05(A)(3) (PTI No. 03-14056, issued 12/11/03)	0.03 grain particulate emissions (PE)/dry standard cubic foot; 0.39 lb PE/hr; 1.71 tons PE/yr from baghouse stack (see A.I.2.a.) No visible fugitive PE from egress points serving this emissions unit
	OAC rule 3745-17-07(A)	See A.I.2.b. and A.I.2.c. Visible PE from the baghouse stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(B)	See A.I.2.d.
	OAC rule 3745-17-07(B)	See A.I.2.e.
	OAC rule 3745-17-08(B)	See A.I.2.f.
	40 CFR, Part 64 - Compliance Assurance Monitoring	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

- 2.a All PE is inclusive of and assumed to be particulate matter less than 10 microns in size (PM10).
- 2.b Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the following:
 - i. the use of a baghouse for controlling ash conveying and collection; and
 - ii. the use of wet suppression for truck loading of ash
- 2.c The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
- 2.d The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.e This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.f This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 2 to 10 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

3. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
- a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:

- a. filter bags;
- b. timing boards and solenoid coils (for blow down function);
- c. diaphragms and diaphragm seal kits;
- d. spare set of belts; and
- e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- 1.a Emission Limitations:
0.03 grain PE/dscf; 0.39 lb PE/hr; 1.71 tons PE/yr

Applicable Compliance Method:

The 0.03 grain PE/dscf is the established maximum outlet concentration for the baghouse. The permittee shall demonstrate compliance with the lb/hr limitation by multiplying the maximum baghouse outlet concentration of 0.03 grain PE/dscf, a maximum volumetric air flow rate of 1,500 acfm, lb/7000 grains, and 60 minutes/hr. If required, compliance with the grain PE/dscf and lb/hr limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

The annual limitation was established by multiplying the lb/hr limitation, times a maximum operating schedule of 8,760 hrs/yr and dividing by ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-14056]

- 1.b Emission Limitation:
No visible fugitive PE from egress points serving this emissions unit

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A, Method 22.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-14056]

- 1.c Emission Limitation:
Visible PE from the baghouse stack 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 in accordance with OAC rule 3745-17-03(B)(1)

[OAC rule 3745-77-07(C)(1) and PTI No. 03-14056]

Facility Name: **Joint Systems Manufacturing Center**
Facility ID: **03-02-02-0027**
Emissions Unit: **Ash Convey System (P017)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
pneumatic ash conveying and collection system, powerhouse ash system, with baghouse and wet suppression system	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Shotblast SB-9 (P019)
Activity Description: Shotblast SB-9

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Pangborn shotblast unit (SB-9), with baghouse	OAC rule 3745-31-05(A)(3) (PTI No. 03-05074, modified and issued 5/8/08)	2.31 lbs particulate emissions (PE)/hr The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	See A.I.2.a.
	40 CFR, Part 64 - Compliance Assurance Monitoring	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

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

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 1.5 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV. below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

3. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- a. filter bags;
 - b. timing boards and solenoid coils (for blow down function);
 - c. diaphragms and diaphragm seal kits;
 - d. spare set of belts; and
 - e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
- a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):
- 1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation:
2.31 lbs PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the emission limitation above by multiplying the maximum outlet concentration (0.03 grain PE/dscf*) by the total maximum volumetric air flow rate (9,000 acfm), dividing by 7,000 grains per lb; and then multiplying by 60 min/hr.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

[OAC rule 3745-77-07(C)(1) and PTI No. 03-05074]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Pangborn shotblast unit (SB-9), with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Shotblast SB-10 (P020)
Activity Description: Shotblast SB-10

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Pangborn shotblast unit (SB-10), with baghouse	OAC rule 3745-31-05(A)(3) (PTI No. 03-05074, modified and issued 5/8/08)	0.83 lb particulate emissions (PE)/hr The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	See A.I.2.a.
	40 CFR, Part 64 - Compliance Assurance Monitoring	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

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

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 1.5 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV. below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

3. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- filter bags;
 - timing boards and solenoid coils (for blow down function);
 - diaphragms and diaphragm seal kits;
 - spare set of belts; and
 - spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
- each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):
- 1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation:
0.83 lb PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the emission limitation above by multiplying the maximum outlet concentration (0.03 grain PE/dscf*) by the total maximum volumetric air flow rate (3,225 acfm), dividing by 7,000 grains/lb; and then multiplying by 60 min/hr.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

[OAC rule 3745-77-07(C)(1) and PTI No. 03-05074]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Pangborn shotblast unit (SB-10), with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Shotblast Media Airwash SB-5 (P023)
Activity Description: Shotblast Media Airwash SB-5

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
400 tons/hr shotblast media airwash separator (SB-5), with baghouse	OAC rule 3745-31-05(A)(3) (PTI No. 03-9669, modified and issued 5/30/96)	0.77 lb particulate emissions (PE)/hr The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	See A.I.2.a.
	40 CFR, Part 64 - Compliance Assurance Monitoring	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

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

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 1.5 to 5 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV. below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

3. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- filter bags;
 - timing boards and solenoid coils (for blow down function);
 - diaphragms and diaphragm seal kits;
 - spare set of belts; and
 - spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
- each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):
- 1.a Emission Limitation:
Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI No. 03-9669]

V. Testing Requirements (continued)

1.b Emission Limitation:
0.77 lb PE/hr

Applicable Compliance Method:

The permittee may determine compliance with the emission limitation above by multiplying the maximum outlet concentration (0.03 grain PE/dscf*) by the total maximum volumetric air flow rate (6,000 acfm), dividing by 7,000; and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with the methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

[OAC rule 3745-77-07(C)(1) and PTI No. 03-9669]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
400 tons/hr shotblast media airwash separator (SB-5), with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Engine Hot Testing (P024)

Activity Description: Tank turbine engines fired by JP 8 jet kerosene, runs the engine with no load other than the transmission (changed from Z010)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2-cell, non-load, turbine engine test area	OAC rule 3745-31-05(A)(3) (PTI No. 03-9871, issued 11/27/96)	1.62 lbs carbon monoxide (CO)/hr 0.22 lb organic compounds (OC)/hr 1.62 lbs nitrogen oxides (NOx)/hr 0.54 lb sulfur dioxide (SO2)/hr See A.II.1. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B).
	OAC rule 3745-17-08(B)	none (See A.I.2.a.)
	OAC rule 3745-17-07(B)	none (See A.I.2.b.)
	OAC rules 3745-21-08(B)	See section A.I.2.c.

2. Additional Terms and Conditions

- 2.a** This facility is not located within an area identified in "Appendix A" of OAC rule 3745-17-08 (it is located outside the City of Lima in Allen County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 03-9871.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. Fuel usage in this emissions unit shall not exceed eight gallons per hour.

[OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:
 - a. the number of gallons of fuel used;
 - b. the number of hours the emissions unit was in operation; and
 - c. the average hourly fuel usage rate (a divided by b), in gallons/hr (average).

[OAC rule 3745-77-07(C)(1) and PTI No. 03-9871]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly fuel usage exceeded 8 gallons per hour, and the actual average hourly fuel usage rate for each such day. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-9871]

V. Testing Requirements

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

- 1.a Emission Limitation:
1.62 lbs CO/hr

Applicable Compliance Method:

Compliance may be determined as follows:

$CO \text{ (lbs/hr)} = \text{the average hourly fuel usage rate (from Section A.III.1.c above)} \times \text{the density of the fuel used (6.76 lbs/gallon)} \times \text{an emission factor of 30 lbs CO/1,000 lbs fuel used}^*$

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

* This emission factor was supplied by the permittee.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-9871]

V. Testing Requirements (continued)

1.b Emission Limitation:
0.22 lb OC/hr

Applicable Compliance Method:
Compliance may be determined as follows:

OC (lbs/hr) = the average hourly fuel usage rate (from Section A.III.1.c above) x the density of fuel used (6.76 lbs/gallon) x an emission factor of 4 lbs OC/1,000 lbs fuel used*

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

* This emission factor was supplied by the permittee.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-9871]

1.c Emission Limitation:
1.62 lbs NOx/hr

Applicable Compliance Method:
Compliance may be determined as follows:

NOx (lbs/hr) = the average hourly fuel usage rate (from Section A.III.1.c above) x the density of fuel used (6.76 lbs/gallon) x an emission factor of 30 lbs NOx/1,000 lbs fuel used*

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 1 - 4, and 7 of 40 CFR, Part 60, Appendix A.

* This emission factor was supplied by the permittee.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-9871]

1.d Emission Limitation:
0.54 lb SO₂/hr

Applicable Compliance Method:
Compliance may be determined as follows:

SO₂ (lbs/hr) = the average hourly fuel usage rate (from Section A.III.1.c above) x the density of fuel used (6.76 lbs/gallon) x an emission factor of 0.005 lb SO₂/1,000 lbs fuel used*

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 1 - 4, and 6 of 40 CFR, Part 60, Appendix A.

* This emission factor was supplied by the permittee.

[OAC rule 3745-77-07(C)(1) and PTI No. 03-9871]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2-cell, non-load, turbine engine test area	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Shotblast SB-13 (P028)

Activity Description: Shotblast Unit (Tank Hull & Turret and Cougar Abrasive Blast)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
shotblast unit (SB-13), with baghouse	OAC rule 3745-31-05(C) (PTI No. 03-17360, modified and issued 1/29/08)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.001 grain per dry standard cubic foot (dscf) and 1.13 tons per year. Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-17-11(B)	See A.I.2.a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	40 CFR, Part 64 - Compliance Assurance Monitoring	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

2.a Permit to Install No. 03-17360 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. use of a baghouse achieving a maximum outlet concentration of 0.001 grain/dscf of PM10* and an associated 0% opacity, as a six-minute average

The potential to emit (PTE) for this emissions unit is 1.13 tons PM10/year. The annual PTE was determined by multiplying the maximum outlet concentration of 0.001 grain PM10/dscf by a maximum volumetric air flow of 30,000 acfm, applying the appropriate conversion factors of 7,000 grains/lb, 1 dscf/1acfm, and 60 minutes/hr; and multiplying by the maximum operating schedule of 8,760 hrs/yr and dividing by 2000 lbs/ton.

*All particulate matter emissions are PM10.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 1 to 8 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1), PTI No. 03-17360 and 40 CFR Part 64]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV. below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

3. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
- a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:

- a. filter bags;
- b. timing boards and solenoid coils (for blow down function);
- c. diaphragms and diaphragm seal kits;
- d. spare set of belts; and
- e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), PTI No. 03-17360 and 40 CFR, Part 64]

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
0.001 grain PM10/dscf

Applicable Compliance Method:

The outlet concentration was established in accordance with the manufacturer's guaranteed fabric filter grain loading. If required, the permittee shall demonstrate compliance with the grain PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[OAC 3745-77-07(C)(1) and PTI No. 03-17360]

- 1.b Emission Limitation:
1.13 tons PM10/year

Applicable Compliance Method:

The annual PTE was determined by multiplying the maximum outlet concentration of 0.001 grain PM10/dscf by a maximum volumetric air flow of 30,000 acfm, applying the appropriate conversion factors of 7,000 grains/lb, 1 dscf/1 acfm, and 60 minutes/hr; and multiplying by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton.

Therefore, if compliance is shown with the grains PM10/dscf limitation, compliance with the annual limitation shall be assumed.

[OAC 3745-77-07(C)(1) and PTI No. 03-17360]

- 1.c Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9.

[OAC 3745-77-07(C)(1) and PTI No. 03-17360]

Facility Name: **Joint Systems Manufacturing Center**
Facility ID: **03-02-02-0027**
Emissions Unit: **Shotblast SB-13 (P028)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
shotblast unit (SB-13), with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Shotblast SB-14 (P029)

Activity Description: Shotblast Unit (Tank Hull & Turret and Cougar Abrasive Blast)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
shotblast unit (SB-14), with baghouse	OAC rule 3745-31-05(C) (PTI No. 03-17360, modified and issued 1/29/08)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.001 grain per dry standard cubic foot (dscf) and 1.13 tons per year. Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average.
	OAC rule 3745-17-11(B)	See A.I.2.a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	40 CFR, Part 64 - Compliance Assurance Monitoring	See Sections A.III. and A.IV.

2. Additional Terms and Conditions

2.a Permit to Install No. 03-17360 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. use of a baghouse achieving a maximum outlet concentration of 0.001 grain/dscf of particulate matter 10 microns or less in size (PM10)* and an associated 0% opacity, as a six-minute average

The potential to emit (PTE) for this emissions unit is 1.13 tons PM10/year. The annual PTE was determined by multiplying the maximum outlet concentration of 0.001 grain PM10/dscf by a maximum volumetric air flow of 30,000 acfm, applying the appropriate conversion factors of 7,000 grains/lb, 1 dscf/1acfm, and 60 minutes/hr; and multiplying by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton.

*All particulate matter emissions are PM10.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

The acceptable range for the pressure drop across the baghouse is 1 to 8 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1), PTI No. 03-17360 and 40 CFR, Part 64]

2. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations. When the static pressure drop shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV. below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

III. Monitoring and/or Record Keeping Requirements (continued)

3. Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
- a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

4. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

5. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR, Part 64]

6. The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:

- a. filter bags;
- b. timing boards and solenoid coils (for blow down function);
- c. diaphragms and diaphragm seal kits;
- d. spare set of belts; and
- e. spare bearings for blower motor.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC rule 3745-77-07(C)(1), PTI No. 03-17360 and 40 CFR, Part 64]

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
0.001 grain PM10/dscf

Applicable Compliance Method:

The outlet concentration was established in accordance with the manufacturer's guaranteed fabric filter grain loading. If required, the permittee shall demonstrate compliance with the grain PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[OAC 3745-77-07(C)(1) and PTI No. 03-17360]

- 1.b Emission Limitation:
1.13 tons PM10/year

Applicable Compliance Method

The annual PTE was determined by multiplying the maximum outlet concentration of 0.001 grain PM10/dscf by a maximum volumetric air flow of 30,000 acfm, applying the appropriate conversion factors of 7,000 grains/lb, 1 dscf/1 acfm, and 60 minutes/hr; and multiplying by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton.

Therefore, if compliance is shown with the grains PM10/dscf limitation, compliance with the annual limitation shall be assumed.

[OAC 3745-77-07(C)(1) and PTI No. 03-17360]

- 1.c Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9.

[OAC 3745-77-07(C)(1) and PTI No. 03-17360]

Facility Name: **Joint Systems Manufacturing Center**
Facility ID: **03-02-02-0027**
Emissions Unit: **Shotblast SB-14 (P029)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
shotblast unit (SB-14), with baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Service Garage Paint Booth (R001)

Activity Description: Bldg.317 - maintenance painting of forklifts, small machinery, etc., air powered spray guns or hand held spray cans

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
service garage paint booth, with dry filtration system	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
[OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day the coating line is in operation:
 - a. the name and identification number of each coating; and
 - b. the VOC content, excluding water and exempt solvents, in lbs per gallon, of each coating
 [OAC rule 3745-77-07(C)(1)]
2. The permittee shall maintain records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
[OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

- 1.a Emission Limitation:
0.551 lb PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 60%, considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

- 1.b Emission Limitation:
Visible PE 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 the visible emissions limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

- 1.c Emission Limitation:
3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 for this emissions unit.

[OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1981 without first applying for and obtaining a permit to install (PTI), in violation of OAC rule 3745-31-02. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete PTI application within 2 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
service garage paint booth, with dry filtration system	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Maintenance Paint Booth (R002)

Activity Description: Bldg.322 - maintenance painting of forklifts, small machinery, etc., air powered spray guns or hand held spray cans

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
maintenance paint booth, with dry filtration system	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
[OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

- The permittee shall collect and record the following information for each day the coating line is in operation:
 - the name and identification number of each coating; and
 - the VOC content, excluding water and exempt solvents, in lbs per gallon, of each coating
 [OAC rule 3745-77-07(C)(1)]
- The permittee shall maintain records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
[OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days after the event occurs.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

- 1.a Emission Limitation:
0.551 lb PE/hr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable PE limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1 - TE) \times (1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 60%, considering 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1)]

- 1.b Emission Limitation:
Visible PE 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 the visible emissions limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

- 1.c Emission Limitation:
3.5 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 for this emissions unit.

[OAC rule 3745-77-07(C)(1)]

Facility Name: **Joint Systems Manufacturing Center**

Facility ID: **03-02-02-0027**

Emissions Unit: **Maintenance Paint Booth (R002)**

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1983 without first applying for and obtaining a permit to install (PTI), in violation of OAC rule 3745-31-02. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete PTI application within 2 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
maintenance paint booth, with dry filtration system	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

THIS IS THE LAST PAGE OF THE PERMIT

Statement of Basis For Title V Permit

Part I - General	
Company Name	Joint Systems Manufacturing Center
Premise Number	0302020027
What makes this facility a Title V facility?	SO ₂ emissions
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	YES
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)

B003, B005 and B006 - changed pressure drop range for baghouse which controls these 3 coal fired boilers from 1-4", to 2-20" water column.

B008 - changed emissions unit ID to P025, and changed to insignificant emissions unit, incorrectly identified as non-insignificant when initial Title V permit issued

B009 - changed emissions unit ID to P026, and changed to insignificant emissions unit, incorrectly identified as non-insignificant when initial Title V permit issued

B010, Z015 and Z031 - emissions units permanently shut down, deleted from permit

K001 - PTI #03-13953, added new emissions limits and terms for OC and PE limits, changed particulate control from "wet curtain system" to "dry filtration system"

K002 - changed particulate control from "wet curtain system" to "dry filtration system"

K004 - PTI #03-13953, new coating line, added all terms from this PTI

K006 - PTI #03-17347, new coating line, added all terms from this PTI

P002 - baghouse pressure drop was incorrect in initial Title V permit, changed to 1 to 5 inches water column

P003, P010, P022, P901, P902, P904, Z001, Z013, Z014, Z016, Z017, Z018, Z019 and Z020 - deleted from insignificant emissions units list, since each is a trivial source, per Engineering Guide #16

P008, PTI #03-17360, added terms from PTI (voluntary grain loading restriction for baghouse)

P017 - PTI #03-14056, added terms from PTI (voluntary grain loading restriction for baghouse)

P024 - renumbered the emissions unit (was previously Z010, but is now non-insignificant)

P028 and P029 - PTI #03-17360, new shot blasters, added all terms from this PTI

R001, R002 - changed from insignificant to non-insignificant status, since there are requirements for PE and OC emissions, added applicable terms

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
None			

C

Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B003, B005, B006	20% opacity, as a 6-min. ave.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - opacity monitor is used to determine compliance, facility submits quarterly excess emission reports for opacity monitor
B007	20% opacity, as a 6-min. ave.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - natural gas is the only fuel allowed to be fired ET - testing not required, inherently clean fuel - M, R and Rp (deviation reporting) only required if fuel other than natural gas is fired CAM is not applicable
K001, K004	0% opacity, as a 6-min. ave.	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - opacity limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - dry filtration system required for coating overspray ET - permittee operates dry filtration system and maintains regular filter change schedule; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings CAM is not applicable

K002, K003, K006, R001, R002	20% opacity, as a 6-min. ave.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - dry filtration system required for coating overspray ET - permittee operates dry filtration system and maintains regular filter change schedule; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings CAM is applicable for K006; CAM is not applicable for K002, K003, R001 and R002
P002, P008	0% opacity, as a 6-min. ave.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - opacity limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - permittee operates a baghouse with maintenance requirements as part of CAM plan; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings
P028, P029	0% opacity, as a 6-min. ave.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - opacity limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - permittee operates a baghouse with maintenance requirements as part of CAM plan; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings; CAM is applicable
P011	20% opacity, as a 6-min. ave.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - permittee operates a baghouse with maintenance requirements as part of CAM plan; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings
P014, P017, P019, P020, P023	20% opacity, as a 6-min. ave.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	ET - permittee operates a baghouse with maintenance requirements as part of CAM plan; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings; CAM is applicable
B003	0.225 lb PE/mmBtu of actual heat input	17-10 (C)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - stack testing required during last 6 months of permit term, based on Engineering Guide #16

B003	4.5 lbs SO ₂ /mmBtu of actual heat input	18-08(l)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - sulfur content is restricted on each coal shipment to ensure compliance with SO ₂ emission limit ET - coal shipment fuel analysis for heat content and sulfur content, and corresponding SO ₂ emissions calculations are sufficient to demonstrate compliance without requiring stack testing
B005, B006	1.6 lbs SO ₂ /mmBtu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - SO ₂ limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - sulfur content is restricted on each coal shipment to ensure compliance with SO ₂ emission limit ET - coal shipment fuel analysis for heat content and sulfur content, and corresponding SO ₂ emissions calculations are sufficient to demonstrate compliance without requiring stack testing
B005, B006	0.62 lb NO _x /mmBtu of actual heat input	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other - NO _x limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - stack testing required twice during permit term, based on Engineering Guide #16
B005, B006	0.03 lb PE/mmBtu of actual heat input	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other - PE limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - stack testing required twice during permit term, based on Engineering Guide #16
B005, B006	0.08 lb CO/mmBtu of actual heat input	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other - CO limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - stack testing required twice during permit term, based on Engineering Guide #16
B007	0.020 PE lb/mmBtu of actual heat input	17-10 (C)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - natural gas is the only fuel allowed to be fired ET - testing not required, inherently clean fuel - M, R and Rp (deviation reporting) only required if fuel other than natural gas is fired CAM is not applicable

B007	0.1 lb NOx/mmBtu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - NOx limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - natural gas is the only fuel allowed to be fired ET - testing not required, inherently clean fuel - M, R and Rp (deviation reporting) only required if fuel other than natural gas is fired CAM is not applicable
B007	4.45 lb CO /mmBtu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - CO limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - natural gas is the only fuel allowed to be fired ET - testing not required, inherently clean fuel - M, R and Rp (deviation reporting) only required if fuel other than natural gas is fired CAM is not applicable
B007	0.04 lb SO2/mmBtu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - SO2 limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - natural gas is the only fuel allowed to be fired ET - testing not required, inherently clean fuel - M, R and Rp (deviation reporting) only required if fuel other than natural gas is fired CAM is not applicable
B003, B005, B006, B007	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	Other - 40 CFR Part 63, Subpart DDDDD ND - This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD). If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA. M, R, Rp and ET - there are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

K001, K004	35 lbs OC/hr and 100.8 tons OC/yr for K001 and K004 combined	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (coating usage and emissions calculations)
K001, K004	3,440 lbs OC/month and 20.64 tons OC/yr from cleanup operations for K001 and K004 combined	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (cleanup materials usage and emissions calculations)
K001, K004	3.00 lbs PE and 8.64 tons PE/yr for K001 and K004 combined	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - dry filtration system required for coating overspray ET - permittee operates dry filtration system and maintains regular filter change schedule; M, R and Rp requirements are sufficient to demonstrate compliance
K001, K004, K006	3.5 lbs VOC/gal minus water and exempt solvents for extreme performance coating (daily volume weighted average)	21-09 (U)(1)(c)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - M, R and Rp requirements are sufficient to demonstrate compliance (maintain supplier formulation data sheets)

K002, K003, R001, R002	3.5 lbs VOC/gal excluding water and exempt solvents	21-09 (U)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - M, R and Rp requirements are sufficient to demonstrate compliance (maintain supplier formulation data sheets)
K002, K003, K006, R001, R002	0.551 lb PE/hr	17-11(B)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - dry filtration system required for coating overspray ET - permittee operates dry filtration system and maintains regular filter change schedule; M, R and Rp requirements are sufficient to demonstrate compliance
K006	172.02 lbs OC/hr and 58.18 tons OC/yr for wash solvent, coating and cleanup operations	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (Note: the hourly OC limit does not require M, R and Rp since the emissions are set at the potential to emit; wash solvent, coating and cleanup materials usage and emissions calculations are compiled)
K006	40.52 tons VOC/rolling 12-month period for wash solvent, coating and cleanup operations	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (wash solvent, coating and cleanup materials usage and emissions calculations are compiled)
K006	0.40 ton PM10/rolling 12-month period	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - permittee operates dry filtration system and maintains regular filter change schedule; M, R and Rp requirements are sufficient to demonstrate compliance

P002	0.01 grain PM10/dry standard cubic foot and 5.08 tons PM10/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P008	0.001 grain PM10/dry standard cubic foot and 2.26 tons PM10/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P011	3.38 lbs PE/hr	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P014	3.02 lbs PE/hr	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P017	0.03 grain PE/dry standard cubic foot; 0.39 lb PE/hr and 1.71 tons PE/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P019	2.31 lbs PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - pressure drop range of 1.5 to 5 inches water column, with pressure drop monitoring required ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable

P020	0.83 lb PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - pressure drop range of 1.5 to 5 inches water column, with pressure drop monitoring required ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P023	0.77 lb PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - pressure drop range of 1.5 to 5 inches water column, with pressure drop monitoring required ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P024	1.62 lbs CO/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - fuel usage is limited to 8 gal/hr ET - M, R and Rp requirements are sufficient to demonstrate compliance (track fuel usage and calculate emissions based on emission factor) CAM is not applicable
P024	0.22 lb OC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - fuel usage is limited to 8 gal/hr ET - M, R and Rp requirements are sufficient to demonstrate compliance (track fuel usage and calculate emissions based on emission factor) CAM is not applicable
P024	1.62 lbs NOx/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - fuel usage is limited to 8 gal/hr ET - M, R and Rp requirements are sufficient to demonstrate compliance (track fuel usage and calculate emissions based on emission factor) CAM is not applicable

P024	0.54 lb SO2/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - fuel usage is limited to 8 gal/hr ET - M, R and Rp requirements are sufficient to demonstrate compliance (track fuel usage and calculate emissions based on emission factor) CAM is not applicable
P028, P029	0.001 grain PM10/dry standard cubic foot and 1.13 tons PM10/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever

Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

C **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.