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

05/06/08

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-22-02-0045
Delphi Chassis Systems - Sandusky Operations
James A. Guerra
2509 Hayes Ave.
Sandusky, OH 44870

Dear James A. Guerra:

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

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
Michigan

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 05/06/08	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-22-02-0045 to:

Delphi Chassis Systems - Sandusky Operations
2509 Hayes Ave.
Sandusky, OH 44870

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

B001 (Boiler #1) Boiler #1 B002 (Boiler #2)	Boiler #2 R002 (Maintenance Paint Spray Booth)	Maintenance Paint Spray Booth

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 <u>Federally Enforceable</u> 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:

#1 Goff shotblaster (P037) and #2 Goff shotblaster (P025);
[PTI #03-02789]

Substation #6 emergency generator (P500 - PBR ID#1740); South Wing emergency generator (P501 - PBR ID#1741); Main Gate diesel fire pump (P502 - PBR ID#1742); and Powerhouse diesel fire pump (P503 - PBR ID#1743)
[Permit by Rule (PBR) - OAC 3745-31-03(A)(4)(b)]

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install (PTI) or Permit by Rule (PBR) for the emissions unit.

[OAC rule 3745-77-07(C)(1), PTI #03-02789, and OAC rule 3745-31-03(A)(4)(b)]

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:

diesel dispensing tank (G101), gasoline dispensing tank (G201), model shop graphite grinding (P003), maintenance tool welding (P007), tool grinding (P008), GM 10 lathe (P028), #3 Goff shotblaster (P038), spindle bearing normalizing furnace #4 (P241), spindle bearing normalizing furnace #5 (P242), spindle bearing normalizing furnace #6 (P243), spindle bearing normalizing furnace #7 (P244), spindle bearing normalizing furnace #1 (P271), spindle bearing normalizing furnace #2 (P272), spindle bearing normalizing furnace #3 (P273), coal storage (Z001), maintenance cabinet blaster (Z002), maintenance cabinet blaster (Z003), maintenance cabinet blaster (Z004), maintenance cabinet blaster (Z005), maintenance cabinet blaster (Z006), black oxide coating (Z007), roads (Z008), ash handling (Z009), north wing - hub machine (Z010), north wing spindle hub machine (Z011), north wing spindle hub hone (Z012), north wing - E,F hub/spindle machining (Z013), south wing T-10 lathes (Z014), south wing spindle machines (Z015), flex lathes (Z016), low volume lathes (Z017), Lean II coating line (Z019); PFC machining (Z021); PFC grinding (Z022); and D-736 south HVAC (Z034).

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #1 (B001)

Activity Description: Boiler #1

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
74.9 mmBtu/hour, coal-fired boiler #1 with sidestream separator (baghouse) and multi-cyclone	OAC rule 3745-31-05(C) (PTI #03-17045, issued 05-25-2006)	9.50 tons hydrogen chloride (HCl) per rolling, 12-month period from emissions units B001 and B002, combined (see A.I.2.a)
	OAC rule 3745-17-10(C)(2)	0.235 pound particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-18-28(E)	1.6 pounds sulfur dioxide (SO2)/mmBtu of actual heat input

2. Additional Terms and Conditions

2.a Annual emissions of HCl shall not exceed 9.50 tons per rolling 12-month period from emission units B001 and B002, combined . The emission limitation is based on a coal throughput restriction (see A.II.3) for the purpose of establishing federally enforceable limitations to avoid "Maximum Achievable Control Technology" (MACT) applicability.

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I. of the terms and conditions of this permit.

[OAC rule 3745-77-07(A)(1) and PTI #03-17045]

II. Operational Restrictions (continued)

2. The maximum rolling, 12-month coal throughput for emissions units B001 and B002 combined is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n} [(Un)(Cn/100)(36/35)\{1- (Rn) \times (K/100)\}] < \text{or} = 9.50$$

where,

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

n = individual lot of coal* utilized during the period;

Un = the throughput of coal for each individual lot n, in tons;

Cn = chlorine content in weight % for each individual coal lot n

(36/35) = molecular weight of chloride is 35 lb/lb-mole and hydrochloric acid is 36 lb/lb-mole

Rn = a value of 1 (one) when fuel additive is employed for HCl control for coal throughput Un, Rn equals a value of 0 (zero) when no fuel additive is employed for coal throughput Un

K = % control efficiency for fuel additive as determined during the most recent performance test (see A.V.2).

*An individual lot of coal, n, is defined as an amount of coal utilized which is consistent in chlorine content and the application or non-application of fuel additive (i.e. lot 1 = 0.1% chlorine & fuel additive applied, lot 2 = 0.1% chlorine & no fuel additive applied, lot 3 = 0.2% chlorine & fuel additive applied, etc)

The equation above assumes 100% of the chlorine contained in the coal is converted to HCl.

[OAC rule 3745-77-07(A)(1) and PTI #03-17045]

3. When fuel additive is employed to control HCl emissions, the application rate, in pounds of fuel additive per ton of coal processed, shall be maintained at a level of not less than the rate established during the most recent performance test (see A.V.2).

[OAC rule 3745-77-07(A)(1) and PTI #03-17045]

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 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.

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

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

Except for an initial operating period after filter media replacement to attain design filtering efficiency, the acceptable range for the pressure drop across the baghouse is 2 to 10 inches of water.

This 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 pressure drop 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 pressure drop 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 PTI #03-17045]

2. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for ash content, sulfur content, chlorine content, and heat content.

For each month, the permittee shall also calculate the sulfur dioxide emission rate (in pounds/mmBtu) based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

3. Requirements for the Sampling and Analysis of the Coal Burned:
The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), chlorine content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, chlorine content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; 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; ASTM method D4208, Standard Test Method for Total Chlorine in Coal by the Oxygen Bomb Combustion/Ion Selective Electrode Method; 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Director (the appropriate Ohio EPA District Office or local air agency).

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

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

5. The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 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) and PTI #03-17045]

6. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

7. The permittee shall maintain records of the following information each month for this emissions unit:

a. The company identification of each lot of coal (as defined in A.II.3) utilized;

b. Documentation as to whether or not fuel additive was applied for each lot of coal utilized;

c. The chlorine content, in weight percent, for each lot of coal utilized;

d. The quantity, in tons, of each lot of coal utilized;

e. The calculated HCl emissions from each lot of coal, in tons, using the following equation:

$$En = [(Un)(Cn/100)(36/35)\{1- (Rn) \times (K/100)\}]$$

where,

En = HCl emissions from individual coal lots utilized;

All other variables are the same as described in A.II.3;

f. The total HCl emission rate of all coal lots utilized, in tons/month, calculated as follows:

$$EM = E1 + E2 + E3 +... +En$$

where:

EM = Monthly HCl emissions, in tons/month; and
En = HCl emissions from each individual lot of coal utilized (A.III.4.e); and

g. The rolling, 12-month HCl emission rate calculated as follows:

$$ET = EM1 + EM2 + EM3 +... +EM12$$

where:

ET = Annual HCl emissions (tons) as summed from the previous 12 months of monthly HCl emissions; and
EM = Monthly HCl emissions (tons/month).

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

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

8. For each lot of coal that fuel additive is employed, the permittee shall maintain the following records:

a. The amount of fuel additive applied, in pounds;

b. The amount of coal utilized, in tons; and

c. The resulting feed rate of the fuel additive, in pounds/ton of coal utilized.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

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 PTI #03-17045]

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record from Section A.III of the terms and conditions of this permit that shows a deviation of the allowable sulfur dioxide emission limitation. 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 45 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

IV. Reporting Requirements (continued)

3. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the appropriate Ohio EPA District Office or local air agency) 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 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 emissions unit, control equipment, and/or 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), PTI #03-17045]

4. The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

5. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet and/or dry) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), chlorine content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. The total quantity of coal received in each shipment (tons);

b. The weighted* average ash content (percent) of the coal received during each calendar month;

c. The weighted* average sulfur content (percent) of the coal received during each calendar month;

d. The weighted* average heat content (Btu/pound) of the coal received during each calendar month; and

e. The weighted* average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received each calendar month.

*In proportion to the quantity of coal received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the coal shipments received during the previous calendar quarters.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

IV. Reporting Requirements (continued)

6. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all exceedances of the following:

a. The 9.50 tons of HCl per rolling, 12-month period emission limitation;

b. The rolling, 12-month coal throughput restriction specified in A.II.3.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

7. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all lots of coal utilized when fuel additive was applied and the fuel additive feed rate in pounds of fuel additive per tons of coal utilized was not maintained at or above the level as specified in Section A.II.4.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

V. Testing Requirements

1. Compliance with the emission limitations specified 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:
9.50 tons hydrogen chloride per rolling, 12-month period from emissions units B001 and B002, combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section A.III.7.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

1.b Emission Limitation:
0.235 pound PE/mmBtu of actual heat input

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation 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) and PTI #03-17045]

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

Applicable Compliance Method:
If required, compliance with the visible emissions limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

1.d Emission Limitation:
1.6 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Sections A.III.2 and A.III.3.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods specified in OAC rule 3745-18-04(D).

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for emissions units B001 in accordance with the following requirements:

2.a The emission testing shall be conducted on emissions units B001 prior to employing a control efficiency for the use of fuel additive for the purposes of calculating HCl emissions (see A.III.7).

2.b The emission testing shall be conducted to determine the emission rate of HCl in pounds per hour. The emission rate of HCl shall be used to calculate the control efficiency (see A.V.2.g).

2.c The following test method(s) from 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and Method 26, as applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

2.d The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

2.e 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).

2.f 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.

2.g A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the 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.

The written report shall include:

i. The amount of fuel additive applied, in pounds, during each run of the emission test;

ii. The amount of coal utilized, in tons, during each run of the emission test;

iii. The potential/theoretical uncontrolled HCl emissions, in pounds/hour, for each run of the emission test calculated using the mass balance approach in Section A.III.7.e that assumes 100% of the chlorine contained in the coal is converted to HCl;

iv. The actual HCl emission rate during each run of the emission test from emissions unit B001; and

v. The HCl control efficiency of the fuel additive calculated for each run of the emission test [(A.V.2.g.iii - A.V.2.g.iv)/A.V.2.g.iii] x 100

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
74.9 mmBtu/hour, coal-fired boiler #1 with sidestream separator (baghouse) and multi-cyclone	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: Boiler #2 (B002)

Activity Description: Boiler #2

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
74.9 mmBtu/hour, coal-fired boiler #2 with sidestream separator (baghouse) and multi-cyclone	OAC rule 3745-31-05(C) (PTI #03-17045, issued 05-25-2006)	9.50 tons hydrogen chloride (HCl) per rolling, 12-month period from emissions units B001 and B002, combined (see A.I.2.a)
	OAC rule 3745-17-10(C)(2)	0.235 pound particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-18-28(E)	1.6 pounds sulfur dioxide (SO2)/mmBtu of actual heat input

2. Additional Terms and Conditions

2.a Annual emissions of HCl shall not exceed 9.50 tons per rolling 12-month period from emission units B001 and B002, combined . The emission limitation is based on a coal throughput restriction (see A.II.3) for the purpose of establishing federally enforceable limitations to avoid "Maximum Achievable Control Technology" (MACT) applicability.

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I. of the terms and conditions of this permit.

[OAC rule 3745-77-07(A)(1) and PTI #03-17045]

II. Operational Restrictions (continued)

2. The maximum rolling, 12-month coal throughput for emissions units B001 and B002 combined is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n} [(Un)(Cn/100)(36/35)\{1- (Rn) \times (K/100)\}] < \text{or} = 9.50$$

where,

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

n = individual lot of coal* utilized during the period;

Un = the throughput of coal for each individual lot n, in tons;

Cn = chlorine content in weight % for each individual coal lot n

(36/35) = molecular weight of chloride is 35 lb/lb-mole and hydrochloric acid is 36 lb/lb-mole

Rn = a value of 1 (one) when fuel additive is employed for HCl control for coal throughput Un, Rn equals a value of 0 (zero) when no fuel additive is employed for coal throughput Un

K = % control efficiency for fuel additive as determined during the most recent performance test (see A.V.2).

*An individual lot of coal, n, is defined as an amount of coal utilized which is consistent in chlorine content and the application or non-application of fuel additive (i.e. lot 1 = 0.1% chlorine & fuel additive applied, lot 2 = 0.1% chlorine & no fuel additive applied, lot 3 = 0.2% chlorine & fuel additive applied, etc)

The equation above assumes 100% of the chlorine contained in the coal is converted to HCl.

[OAC rule 3745-77-07(A)(1) and PTI #03-17045]

3. When fuel additive is employed to control HCl emissions, the application rate, in pounds of fuel additive per ton of coal processed, shall be maintained at a level of not less than the rate established during the most recent performance test (see A.V.2).

[OAC rule 3745-77-07(A)(1) and PTI #03-17045]

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 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.

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

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

Except for an initial operating period after filter media replacement to attain design filtering efficiency, the acceptable range for the pressure drop across the baghouse is 2 to 10 inches of water.

This 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 pressure drop 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 pressure drop 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 PTI #03-17045]

2. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for ash content, sulfur content, chlorine content, and heat content.

For each month, the permittee shall also calculate the sulfur dioxide emission rate (in pounds/mmBtu) based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

3. Requirements for the Sampling and Analysis of the Coal Burned:
The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), chlorine content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, chlorine content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; 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; ASTM method D4208, Standard Test Method for Total Chlorine in Coal by the Oxygen Bomb Combustion/Ion Selective Electrode Method; 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Director (the appropriate Ohio EPA District Office or local air agency).

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

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

5. The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 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) and PTI #03-17045]

6. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

7. The permittee shall maintain records of the following information each month for this emissions unit:

a. The company identification of each lot of coal (as defined in A.II.3) utilized;

b. Documentation as to whether or not fuel additive was applied for each lot of coal utilized;

c. The chlorine content, in weight percent, for each lot of coal utilized;

d. The quantity, in tons, of each lot of coal utilized;

e. The calculated HCl emissions from each lot of coal, in tons, using the following equation:

$$En = [(Un)(Cn/100)(36/35)\{1- (Rn) \times (K/100)\}]$$

where,

En = HCl emissions from individual coal lots utilized;

All other variables are the same as described in A.II.3;

f. The total HCl emission rate of all coal lots utilized, in tons/month, calculated as follows:

$$EM = E1 + E2 + E3 +... +En$$

where:

EM = Monthly HCl emissions, in tons/month; and
En = HCl emissions from each individual lot of coal utilized (A.III.4.e); and

g. The rolling, 12-month HCl emission rate calculated as follows:

$$ET = EM1 + EM2 + EM3 +... +EM12$$

where:

ET = Annual HCl emissions (tons) as summed from the previous 12 months of monthly HCl emissions; and
EM = Monthly HCl emissions (tons/month).

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

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

8. For each lot of coal that fuel additive is employed, the permittee shall maintain the following records:

a. The amount of fuel additive applied, in pounds;

b. The amount of coal utilized, in tons; and

c. The resulting feed rate of the fuel additive, in pounds/ton of coal utilized.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

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 PTI #03-17045]

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record from Section A.III of the terms and conditions of this permit that shows a deviation of the allowable sulfur dioxide emission limitation. 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 45 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

IV. Reporting Requirements (continued)

3. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the appropriate Ohio EPA District Office or local air agency) 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 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 emissions unit, control equipment, and/or 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), PTI #03-17045]

4. The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

5. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet and/or dry) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), chlorine content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:

a. The total quantity of coal received in each shipment (tons);

b. The weighted* average ash content (percent) of the coal received during each calendar month;

c. The weighted* average sulfur content (percent) of the coal received during each calendar month;

d. The weighted* average heat content (Btu/pound) of the coal received during each calendar month; and

e. The weighted* average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received each calendar month.

*In proportion to the quantity of coal received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the coal shipments received during the previous calendar quarters.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

IV. Reporting Requirements (continued)

6. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all exceedances of the following:

a. The 9.50 tons of HCl per rolling, 12-month period emission limitation;

b. The rolling, 12-month coal throughput restriction specified in A.II.3.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

7. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all lots of coal utilized when fuel additive was applied and the fuel additive feed rate in pounds of fuel additive per tons of coal utilized was not maintained at or above the level as specified in Section A.II.4.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

V. Testing Requirements

1. Compliance with the emission limitations specified 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:
9.50 tons hydrogen chloride per rolling, 12-month period from emissions units B001 and B002, combined

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section A.III.7.

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

1.b Emission Limitation:
0.235 pound PE/mmBtu of actual heat input

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation 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) and PTI #03-17045]

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

Applicable Compliance Method:
If required, compliance with the visible emissions limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

1.d Emission Limitation:
1.6 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Sections A.III.2 and A.III.3.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods specified in OAC rule 3745-18-04(D).

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for emissions units B001 in accordance with the following requirements:

2.a The emission testing shall be conducted on emissions units B001 prior to employing a control efficiency for the use of fuel additive for the purposes of calculating HCl emissions (see A.III.7).

2.b The emission testing shall be conducted to determine the emission rate of HCl in pounds per hour. The emission rate of HCl shall be used to calculate the control efficiency (see A.V.2.g).

2.c The following test method(s) from 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and Method 26, as applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

2.d The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

2.e 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).

2.f 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.

2.g A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the 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.

The written report shall include:

i. The amount of fuel additive applied, in pounds, during each run of the emission test;

ii. The amount of coal utilized, in tons, during each run of the emission test;

iii. The potential/theoretical uncontrolled HCl emissions, in pounds/hour, for each run of the emission test calculated using the mass balance approach in Section A.III.7.e that assumes 100% of the chlorine contained in the coal is converted to HCl;

iv. The actual HCl emission rate during each run of the emission test from emissions unit B001; and

v. The HCl control efficiency of the fuel additive calculated for each run of the emission test [(A.V.2.g.iii - A.V.2.g.iv)/A.V.2.g.iii] x 100

[OAC rule 3745-77-07(C)(1) and PTI #03-17045]

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
74.9 mmBtu/hour, coal-fired boiler #2 with sidestream separator (baghouse) and multi-cyclone	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 Spray Booth (R002)

Activity Description: Maintenance Paint 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
maintenance spray booth for miscellaneous metal parts	OAC rule 3745-21-09(U)(2)(e)	Refer to section A.II.1 of the terms and conditions of this permit.
	OAC rule 3745-17-11(C) (See A.I.2.b.)	See A.II.2 and A.III.2.
	OAC rule 3745-17-07(A)	none (Refer to section A.I.2.a of the terms and conditions of this permit).
	OAC rule 3745-17-11(B) (See A.I.2.c.)	none (Refer to section A.I.2.a of the terms and conditions of this permit).

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Erie County, which is identified as a P-3 county.

This emissions unit is exempt from the visible emissions (PE) limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to any mass emission limitation in OAC rule 3745-17-11.

2.b On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11 and the associated operational restrictions, monitoring, record keeping and reporting requirements in this permit shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

2.c The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.

II. Operational Restrictions

1. The coating usage rate in this emissions unit shall not exceed 10 gallons/day.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(U)(2)(e)]

II. Operational Restrictions (continued)

2. Any surface coating process not exempt under paragraphs (A)(1)(h) to (A)(1)(l) of OAC rule 3745-17-11 shall be controlled by a dry particulate filter, waterwash, or equivalent control device or devices.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the folowing information each day for the coating line:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all the coatings employed.

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

2. Any surface coating process not exempt under paragraph (A)(1)(h) to (A)(1)(k) of OAC rule 3745-17-11 shall follow all of these work practices:

2.a The owner or operator shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the owner or operator during the time period in which the control devices are utilized.

2.b The owner or operator shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator.

2.c The owner or operator shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the owner or operator shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the owner or operator shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

2.d The owner or operator shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

2.e In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the owner or operator, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The owner or operator shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

2.f Any documentation required under paragraphs (C)(2)(d) and (C)(2)(e) of OAC rule 3745-17-11 shall be maintained for not less than five years.

2.g Any documentation required under paragraphs (C)(2)(a) to (C)(2)(e) of OAC rule 3745-17-11 shall be maintained at the facility and shall be made available to Ohio EPA upon request.

[OAC 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

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 that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. 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 45 days after the exceedance occurs.

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

V. Testing Requirements

1. Compliance with the emission limitations specified 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:
coatings usage shall not exceed 10 gallons/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section A.III.1.

[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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
maintenance spray booth for miscellaneous metal parts	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

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THIS IS THE LAST PAGE OF THE PERMIT

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Statement of Basis For Title V Permit

Part I - General	
Company Name	Delphi Corporation - Sandusky Operations
Premise Number	0322020045
What makes this facility a Title V facility?	PE, SO2
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)	B001 & B002 - PTI #03-17045, issued 05-25-2006, to establish synthetic minor limits for HCl to avoid MACT. Limit restricts coal used on a rolling 12-month basis.
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)	B001 & B002 - PTI #03-17045, issued 05-25-2006, to establish synthetic minor limits for HCl to avoid MACT. Limit restricts coal used on a rolling 12-month basis. R002 - maintenance spray booth - no PTI - subject to OAC 3745-21-09(U)(2)(e)

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	77-07	31-03(A)(4)(b)	States insignificant EUs at the facility that have PTI or PBR requirements.

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												
B001, B002	9.50 tons HCl per rolling, 12-month period, from B001 & B002, combined	31-05(C)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The maximum rolling, 12-month coal throughput for B001 & B002 combined is limited by an equation which considers the chlorine content in weight % for each individual coal lot, and assumes that 100% of the chlorine contained in the coal is converted to HCl. Also, when fuel additive is employed to control HCl emissions, the application rate, in lbs of fuel additive per ton of coal processed, shall be maintained at a level of not less than the rate established during the most recent performance test. CEM is not justified. CAM is not applicable. ET - recordkeeping requirements are sufficient to show compliance, however, emission testing is required prior to employing a control efficiency for the use of fuel additive for the purposes of calculating HCl emissions.

B001, B002	0.235 pound PE/mmBtu of actual heat input	17-10(C)(2)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - pressure drop across the sidestream separator (baghouse) shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation. CEM is not justified. CAM is not applicable. ET - If required, the permittee shall demonstrate compliance with this emission limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.
B001, B002	Visible emissions shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M, R, & Rp - A Continuous Opacity Monitor (COM) is required to be utilized for these emissions units to ensure compliance with the 20% opacity requirement. ET - If required, compliance with the visible emissions limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
B001, B002	1.6 lbs SO2 /mmBtu of actual heat input	18-28(E)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The quality of the coal burned shall meet a sulfur content that is sufficient to comply sith the allowable emission limitation. CEM is not justified. CAM is not applicable. ET - recordkeeping requirements are sufficient to show compliance, however, if required, the permittee shall demonstrate compliance with this emissions limitation in accordance with the methods specified in OAC rule 3745-18-04(D).
R002	Coating usage rate shall not exceed 10 gallons/day	21-09(U)(2)(e)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The coating usage rate in this emissions uit shall not exceed 10 gallons/day. ET - recordkeeping requirements are sufficient to show compliance.
R002	Use of particulate control and work practice require-ments	17-11(C)	N	N	Y	Y	N	N	Y	N	N	N	N	N	OR - Use of particulate control device. M,R, & R - Monitoring and record keeping requirements are work practice standards obtained directly from the applicable rule. No reporting is required, however, the company is required to maintain documentation on site for not less than 5 years, and to make the documentation available to Ohio EPA upon request. ET - not required since there is no emissions limitation established pursuant to this rule.

R002	none	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND- This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

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 <u>Instructions for Part III:</u>

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 <u>all</u> 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.