



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

09/30/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-02-02-0027
Lima Army Tank Plant
CLETE HOERSTEN
1155 BUCKEYE ROAD
LIMA, OH 45804-1898

Dear CLETE HOERSTEN:

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.

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 or comments concerning this draft Title V permit, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Northwest District Office
Indiana



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 09/30/99

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Lima Army Tank Plant
1155 Buckeye Road
Lima, OH

of a Title V permit for Facility ID: 03-02-02-0027

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

B003 (Boiler #4)

Boiler #4 is fired by bituminous coal (source classification code = 1-02-002-04), has a heat input capacity of 67.4 MMBtu/hr, and supplies steam heat to various LATP buildings and processes. Particulate emissions due to operation of Boiler #4 are controlled by a baghouse which also controls particulate emissions from Boilers 5 and 6.

B005 (Boiler #5)

Boiler #5 is fired by bituminous coal (source classification code = 1-02-002-04), has a heat input capacity of 93.8 MMBtu/hr, and supplies steam heat to various LATP buildings and processes. Particulate emissions due to operation of Boiler #5 are controlled by a baghouse which also controls particulate emissions from Boilers 4 and 6.

B006 (Boiler #6)

Boiler #6 is fired by bituminous coal (source classification code = 1-02-002-04), has a heat input capacity of 62.5 MMBtu/hr, and supplies steam heat to various LATP buildings and processes. Particulate emissions due to operation of Boiler #6 are controlled by a baghouse which also controls particulate emissions from Boilers 4 and 5.

B007 (Boiler #7)

Boiler #7 is fired by natural gas (source classification code = 1-02-006-02), has a heat input capacity of 73.0 MMBtu/hr, and supplies steam heat to various LATP buildings and processes. Nitrogen Oxide emissions due to operation of Boiler #7 are controlled by low-NOx burners.

F002 (Miscellaneous Welding Operations (Bldg. 147))

Bldg. 147 contains numerous welding units dedicated to welding of tank armor plates, tank appurtenances, and miscellaneous metallic materials. The majority of this welding is classified as shielded metal arc welding (SMAW).

K001 (Structures Paint Line)

The Structures Paint Line applies primer and topcoat to tank hulls and turrets. In addition, the Structures Paint Line includes a booth for application of touch-up paint which is applied prior to shipping the tank out.

K002 (Small Parts Paint Line)

The Small Parts Paint Line applies primer and topcoat to "small" tank parts. This is accomplished by hanging the tank parts on conveyor hooks and, after passing through the small parts shot blast unit (P011), applying primer and topcoat via air-atomized spray guns.

K003 (Final Paint Line)

The Final Paint Line applies touch-up paint to assembled tanks prior to shipping them out.

P002 (11.1 TPH Shotblast Unit, SB5, (Hull and Turret))

The SB5 Abrasive Blast Room removes scale and rust from tank hulls and turrets prior to applying paint. This is accomplished by sealing each tank in an enclosed booth and propelling shot blast material at the structure via centrifugal blast wheels. Particulate emissions due to operation of the SB5 shot blast unit are controlled by two parallel baghouses (P002 and P023).

P008 (SB6 Touch Up Blast)

The SB6 Touch Up Blast Room removes scale and rust from tank hulls and turrets which was missed in the SB5 Abrasive Blast Room. This is accomplished by sealing the structure in a booth and then manually spraying abrasive blast material. Particulate emissions due to this process are controlled by a single baghouse.

P011 (SB7 Small Parts Abrasive Blast)

The SB7 Abrasive Blast Unit removes scale and rust from tank small parts prior to applying primer and paint. This is accomplished by hanging the parts on conveyor hooks and conveying them through the abrasive blast enclosure. Particulate emissions due to operation of the SB7 abrasive blast unit are controlled by a single baghouse.

P014 (SB8 Shot Blast Machine (Bldg. 351))

Bldg. 351's Shot Blast Machine is used to remove scale and rust from tank armor plates. Particulate emissions due to operation of the SB8 Shot blast machine are controlled by a single baghouse.

P017 (Pneumatic Ash Conveying and Storage System)

The pneumatic ash conveying and storage system carries fly and bottom ash from Boiler #'s 4, 5, and 6 to a storage silo. In addition, this system carries particulate collected by the baghouse which serves Boiler #'s 4, 5, and 6 to the storage silo. Ash which has been deposited into the storage silo is then unloaded in trucks and hauled away. Particulate emissions generated due to ash transfer into the silo are controlled by a single baghouse.

P019 (SB9 Pangborn Shot Blast Machine)

The SB9 Abrasive Blast Unit removes scale and rust from large armor plates. This is accomplished by conveying the steel plate through a blast enclosure where shot is propelled via centrifugal wheel blast. Particulate emissions due to operation of the SB9 Abrasive Blast Unit are controlled by a single cartridge filter unit.

P020 (SB10 Pangborn Shot Blast Machine)

The SB10 Abrasive Blast Unit removes scale and rust from small armor plates. This is accomplished by conveying the steel plate through a blast enclosure where shot is propelled via centrifugal wheel blast. Particulate emissions due to operation of the SB10 Abrasive Blast Unit are controlled by a single cartridge filter unit.

P023 (400 TPH Shotblast Media Airwash Separator, SB5)

The SB5 Abrasive Blast Room removes scale and rust from tank hulls and turrets prior to applying paint. This is accomplished by sealing each tank in an enclosed booth and propelling shot blast material at the structure via centrifugal blast wheels. Particulate emissions due to operation of the SB5 shot blast unit are controlled by two parallel baghouses (P002 and P023).

Z004 (PA 1 Air Make Up Heater)

PA 1 Air Make Up is fired by natural gas and supplies process air to the structures paint line booth PA1.

Z005 (PA 2 Air Make Up Heater)

PA 2 Air Make Up is fired by natural gas and supplies process air to the structures paint line booth PA2.

Z006 (PA 5 Air Make Up Heater)

PA 5 Air Make Up is fired by natural gas and supplies process air to the structures paint line booth PA5.

Z010 (Engine Hot Testing)

Tank turbine engines fired by JP 8 jet kerosene are tested in the engine hot test room. This engine testing follows a test protocol and runs the engine with no load other than that of the transmission.

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 3745-77-04(A) 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

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining

to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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.

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.

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 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.

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.

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 appropriate Ohio EPA District Office or local air agency 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 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.

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.

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).

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.

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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and
- 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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

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.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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).

4. 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.

5. 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.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

Coal Conveying and Storage Piles (F001); Battery Charging (P003); Tool Room (P004); Cutter Grind Shop (P007); Flame Cut Plate Cutting (P009); Maintenance Carpentry Shop (P010); Welding School (Bldg. 147) (P012); Laser Cutting of GRP (P013); Plasma Arc Punch Presses (P015); Portable Arc Welders and Grinders (P016); Millwright Shop (P018); Coal Crusher (P022); Service Garage Paint Booth (R001); Bldg. 322 Maintenance Paint Booth (R002); LAMP Vehicle Fueling Operations (Z001); Emergency Generators (Z002); Fire Pumps (Z003); PA 10 Air Make Up Heater (Z007); PA 11 Air Make Up Heater (Z008); PA 12 Air Make Up Heater (Z009); Component and Final Assembly Solvent Cleaning (Z011); Gasoline and Diesel Fueling Operations (Z012); Kerosene Fueling Operations (Z013); Miscellaneous Indoor Fugitive Particulate Sources (Z014); Vibratory Deburr Unit (Z015); Vibratory Deburr Unit (Z016); Aluminum Scrap Pile (Z017); 10,000 Gallon Waste Oil Tank (TK 61) (Z018); 10,000 Gallon Waste Oil Tank (TK 17) (Z019); 10,000 Gallon Waste Oil Tank (TK 16) (Z020); Miscellaneous Welding (Bldg. 266) (Z022); Media Blast (Shot, SB 11) (Z025); Lyons Mills (Z026); Pontiac Mill (Z027); Media Blast (Shot, SB 12) (Z028); Media Blast (Shot) (Z029); Plasma Arc Plate Cutting (Z030); Savage Saw (Aluminum Cut) (Z031); Fuel Cell Insulating (Z032).

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 for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #4 (B003)

Activity Description: Boiler #4 is fired by bituminous coal (source classification code = 1-02-002-04), has a heat input capacity of 67.4 MMBtu/hr, and supplies steam heat to various LAMP buildings and processes. Particulate emissions due to operation of Boiler #4 are controlled by a baghouse which also controls particulate emissions from Boilers 5 and 6.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
67.4 mmBtu/hr coal-fired boiler #4, with baghouse	OAC rule 3745-17-07 (A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10 (C)(1)	0.225 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-18-08 (I)	4.5 lbs sulfur dioxide emissions (SO ₂)/mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of the coal burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.
- The pressure drop across the baghouse shall be maintained within the range of 1-4 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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

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

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

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

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

2. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a frequency of two days per week. Each sample shall be collected from the coal hopper. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

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

3. The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated sulfur dioxide emission rate, in lbs/mmBtu, based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during a calendar month.
4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

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

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

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

IV. Reporting Requirements (continued)

3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.2 of the terms and conditions of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulates.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates: Methods 1-5 of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

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

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

Applicable Compliance Method: The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section A.V.1 of this permit.

- 3.b Emission Limitation:
20% opacity, as a 6 minute average, except as provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

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

Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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 #5 (B005)

Activity Description: Boiler #5 is fired by bituminous coal (source classification code = 1-02-002-04), has a heat input capacity of 93.8 MMBtu/hr, and supplies steam heat to various LATP buildings and processes. Particulate emissions due to operation of Boiler #5 are controlled by a baghouse which also controls particulate emissions from Boilers 4 and 6.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
93.8 mmBtu/hr coal-fired boiler #5, with baghouse	OAC rule 3745-17-07 (A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10 (C)(1)	See A.I.2.a.
	OAC rule 3745-18-08 (A)	See A.I.2.a.
	OAC rule 3745-31-05 (PTI #03-1167)	1.6 lbs sulfur dioxide (SO ₂)/mmBtu of actual heat input
		0.62 lb nitrogen oxides (NO _x)/mmBtu of actual heat input
		0.03 lb particulate emissions (PE)/mmBtu of actual heat input

2. Additional Terms and Conditions

- 2.a The emission limitation from this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

- The quality of the coal burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.
- The pressure drop across the baghouse shall be maintained within the range of 1-4 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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

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

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

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

2. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a frequency of two days per week. Each sample shall be collected from the coal hopper. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

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

3. The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated sulfur dioxide emission rate, in lbs/mmBtu, based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during a calendar month.
4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

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

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

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.
3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.2 of the terms and conditions of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulates and NOx.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE - Methods 1-5 of 40 CFR Part 60, Appendix A
NOx - Method 7 of 40 CFR Part 60, Appendix A
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

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

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section A.V.1 of this permit.

- 3.b Emission Limitation:
20% opacity, as a-6 minute average, except as provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 3.c Emission Limitation:
1.6 lbs sulfur dioxide emissions (SO₂)/mmBtu of actual heat input

Applicable Compliance Method:

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

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

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section A.V.1 of this permit.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
93.8 mmBtu/hr coal-fired boiler #5, with baghouse	OAC rule 3745-31-05 (PTI #03-1167)	0.08 lb carbon monoxide (CO)/mmBtu of actual heat input

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

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for CO: Method 10 of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

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

Emission Limitation:

0.08 lb CO/mmBtu of actual heat input

Applicable Compliance Method: The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section B.V.1 of this permit.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #6 (B006)

Activity Description: Boiler #6 is fired by bituminous coal (source classification code = 1-02-002-04), has a heat input capacity of 62.5 MMBtu/hr, and supplies steam heat to various LATP buildings and processes. Particulate emissions due to operation of Boiler #6 are controlled by a baghouse which also controls particulate emissions from Boilers 4 and 5.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
62.5 mmBtu/hr coal-fired boiler #5, with baghouse	OAC rule 3745-17-07 (A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10 (C)(1)	See A.I.2.a.
	OAC rule 3745-18-08 (A)	See A.I.2.a.
	OAC rule 3745-31-05 (PTI #03-1167)	1.6 lbs sulfur dioxide (SO ₂)/mmBtu of actual heat input
		0.62 lb nitrogen oxides (NO _x)/mmBtu of actual heat input
		0.03 lb particulate emissions (PE)/mmBtu of actual heat input

2. Additional Terms and Conditions

- 2.a The emission limitation from this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

- The quality of the coal burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.
- The pressure drop across the baghouse shall be maintained within the range of 1-4 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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

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

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

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

2. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a frequency of two days per week. Each sample shall be collected from the coal hopper. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

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

3. The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated sulfur dioxide emission rate, in lbs/mmBtu, based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during a calendar month.
4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

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

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

2. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.
3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.2 of the terms and conditions of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulates and NOx.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE - Methods 1-5 of 40 CFR Part 60, Appendix A
NOx - Method 7 of 40 CFR Part 60, Appendix A
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

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

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section A.V.1 of this permit.

- 3.b Emission Limitation:
20% opacity, as a-6 minute average, except as provided by rule

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 3.c Emission Limitation:
1.6 lbs sulfur dioxide emissions (SO₂)/mmBtu of actual heat input

Applicable Compliance Method:

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

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

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section A.V.1 of this permit.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
93.8 mmBtu/hr coal-fired boiler #5, with baghouse	OAC rule 3745-31-05 (PTI #03-1167)	0.08 lb carbon monoxide (CO)/mmBtu of actual heat input

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

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for CO: Method 10 of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

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

Emission Limitation:
0.08 lb CO/mmBtu of actual heat input

Applicable Compliance Method: The permittee shall demonstrate compliance with the emission limitation above based upon the results of the emission testing required in Section B.V.1 of this permit.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #7 (B007)

Activity Description: Boiler #7 is fired by natural gas (source classification code = 1-02-006-02), has a heat input capacity of 73.0 MMBtu/hr, and supplies steam heat to various LAMP buildings and processes. Nitrogen Oxide emissions due to operation of Boiler #7 are controlled by low-NOx burners.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
73 mmBtu/hr natural gas-fired boiler	OAC rule 3745-17-10 (B)(1)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07 (A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-31-05 (PTI #03-7167)	0.1 lb nitrogen oxides (NOx)/mmBtu of actual heat input 4.45 lbs carbon monoxide (CO)/mmBtu of actual heat input 0.04 lb sulfur dioxide (SO ₂)/mmBtu of actual heat input
	40 CFR Part 60, Subpart Dc	Exempt, see A.II.1.

2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, there is no SO₂ emission limitation for this emissions unit established by OAC Chapter 3745-18.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

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

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1).

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

Applicable Compliance Method:
Compliance with the emission limitation of 0.020 lb PE/mmBtu shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (80,300 cu. ft./hr) by the AP-42 Fifth Edition, Table 1.4-1 emission factor for natural gas of 1.9 lbs PE (filterable)/mmscf and dividing by the maximum hourly heat input capacity of the emissions unit (73 mmBtu/hr).

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

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

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

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

- a. for NO_x : 100 lbs/mm³.ft;
- b. for SO₂ : 0.6 lbs/mm³.ft; and
- c. for CO : 84 lbs/mm³.ft.

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: Miscellaneous Welding Operations (Bldg. 147) (F002)

Activity Description: Bldg. 147 contains numerous welding units dedicated to welding of tank armor plates, tank appurtenances, and miscellaneous metallic materials. The majority of this welding is classified as shielded metal arc welding (SMAW).

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
miscellaneous welding operations	None	See A.I.2.a.

2. Additional Terms and Conditions

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

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Structures Paint Line (K001)

Activity Description: The Structures Paint Line applies primer and topcoat to tank hulls and turrets. In addition, the Structures Paint Line includes a booth for application of touch-up paint which is applied prior to shipping the tank out.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3 downdraft paint spray booths with, oven	OAC rule 3745-21-09 (U)	3.5 pounds volatile organic compounds (VOC)/gallon coating, excluding water and exempt solvents
	OAC rule 3745-17-07	20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11	6.72 lbs particulate emissions (PE)/hr

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC emission limitation specified above on an "as applied" basis.
2. The permittee shall operate the wet curtain system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. The permittee shall maintain daily records that document any time periods when the wet curtain system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. 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 wet curtain system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
3.5 pounds VOC/gallon of coating (excluding water and exempt solvents)

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section A.III.1 of this permit.
 - 1.b Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)
 - 1.c Emission Limitation:
6.72 lbs/hr PE

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

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

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

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

If required, the permittee shall demonstrate compliance with the above emission limit pursuant to OAC rule 3745-17-03(B)(10).
2. Formulation data or USEPA Method 24 shall be used to determine the VOC content of all the coatings.

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1979 without first applying for and obtaining a permit to install, in violation of OAC rule Chapter 3745-31. Therefore, the permittee shall perform the following in order to bring this emissions unit into compliance:
 - a. Submit a complete PTI application within 2 months following the issuance of this permit; and
 - b. Obtain a PTI within 8 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Small Parts Paint Line (K002)

Activity Description: The Small Parts Paint Line applies primer and topcoat to "small" tank parts. This is accomplished by hanging the tank parts on conveyor hooks and, after passing through the small parts shot blast unit (P011), applying primer and topcoat via air-atomized spray guns.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3 downdraft paint spray booths with, oven	OAC rule 3745-21-09 (U)	3.5 pounds volatile organic compounds (VOC)/gallon coating, excluding water and exempt solvents
	OAC rule 3745-17-07	20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11	0.551 lb particulate emissions (PE)/hr

2. Additional Terms and Conditions

None

II. Operational Restrictions

- Each coating employed in this emissions unit shall comply with the VOC emission limitation specified above on an "as applied" basis.
- The permittee shall operate the wet curtain system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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

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

- The permittee shall maintain daily records that document any time periods when the wet curtain system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. 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 wet curtain system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
3.5 pounds VOC/gallon of coating (excluding water and exempt solvents)

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section A.III.1 of this permit.
 - 1.b Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)
 - 1.c Emission Limitation:
0.551 lbs/hr PE

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

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

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

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

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).
2. Formulation data or USEPA Method 24 shall be used to determine the VOC content of all the coatings.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3 downdraft paint spray booths with, oven	OAC rule 3745-31-05 PTI # 03-1196	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Final Paint Line (K003)

Activity Description: The Final Paint Line applies touch-up paint to assembled tanks prior to shipping them out.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
final tank painting line (2 spray booths with bake oven)	OAC rule 3745-21-09 (U)	3.5 pounds volatile organic compounds (VOC)/gallon coating, excluding water and exempt solvents
	OAC rule 3745-17-07	20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11	5.5 lbs particulate emissions (PE)/hr

2. Additional Terms and Conditions

None

II. Operational Restrictions

- Each coating employed in this emissions unit shall comply with the VOC emission limitation specified above on an "as applied" basis.
- The permittee shall operate the wet curtain system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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

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

- The permittee shall maintain daily records that document any time periods when the wet curtain system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. 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 wet curtain system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
3.5 pounds VOC/gallon of coating (excluding water and exempt solvents)

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section A.III.1 of this permit.
 - 1.b Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)
 - 1.c Emission Limitation:
5.5 lbs/hr PE

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

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

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

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

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).
2. Formulation data or USEPA Method 24 shall be used to determine the VOC content of all the coatings.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
final tank painting line (2 spray booths with bake oven)	OAC rule 3745-31-05 PTI # 03-3558	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: 11.1 TPH Shotblast Unit, SB5, (Hull and Turret) (P002)

Activity Description: The SB5 Abrasive Blast Room removes scale and rust from tank hulls and turrets prior to applying paint. This is accomplished by sealing each tank in an enclosed booth and propelling shot blast material at the structure via centrifugal blast wheels. Particulate emissions due to operation of the SB5 shot blast unit are controlled by two parallel baghouses (P002 and P023).

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
11.1 tons/hr shotblast unit, with baghouse	OAC rule 3745-17-11 (B)(1)	16.1 lbs particulate emission (PE)/hr
	OAC rule 3745-17-07 (A)	20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2-8 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1 of the terms and conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

1.b Emission Limitation:
16.1 pounds PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying a maximum outlet concentration of 0.03 grain PE/scf* by the total maximum volumetric air flow rate (25,000 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
11.1 tons/hr shotblast unit, with baghouse	OAC rule 3745-31-05 (PTI #03-1542)	3.21 lbs particulate emission (PE)/hr

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

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

Emission Limitation:
3.21 lbs PE/hour

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation by multiplying a maximum outlet concentration of 0.03 grain PE/scf* by the total maximum volumetric air flow rate (25,000 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: SB6 Touch Up Blast (P008)

Activity Description: The SB6 Touch Up Blast Room removes scale and rust from tank hulls and turrets which was missed in the SB5 Abrasive Blast Room. This is accomplished by sealing the structure in a booth and then manually spraying abrasive blast material. Particulate emissions due to this process are controlled by a single baghouse.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
shotblast unit (SB6), with baghouse	OAC rule 3745-17-11 (B)(1) OAC rule 3745-17-07 (A)	23.4 lbs particulate emission (PE)/hr 20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1-4 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1 of the terms and conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

1.b Emission Limitation:
23.4 lbs PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying a maximum outlet concentration of 0.03 grain PE/scf* by the total maximum volumetric air flow rate (3,410 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: SB7 Small Parts Abrasive Blast (P011)

Activity Description: The SB7 Abrasive Blast Unit removes scale and rust from tank small parts prior to applying primer and paint. This is accomplished by hanging the parts on conveyor hooks and conveying them through the abrasive blast enclosure. Particulate emissions due to operation of the SB7 abrasive blast unit are controlled by a single baghouse.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
shotblast unit (SB7), with baghouse	OAC rule 3745-17-11 (B)(1) OAC rule 3745-17-07 (A)	54.4 lbs particulate emission (PE)/hr 20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1-4 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1 of the terms and conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

1.b Emission Limitation:
54.4 lbs PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying a maximum outlet concentration of 0.03 grain PE/scf* by the total maximum volumetric air flow rate (23,600 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
shotblast unit (SB7), with baghouse	OAC rule 3745-31-05 PTI #03-1196	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: SB8 Shot Blast Machine (Bldg. 351) (P014)

Activity Description: Bldg. 351's Shot Blast Machine is used to remove scale and rust from tank armor plates. Particulate emissions due to operation of the SB8 Shot blast machine are controlled by a single baghouse.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
shotblast unit (SB8), with baghouse	OAC rule 3745-17-11 (B)(1) OAC rule 3745-17-07 (A)	3.02 lbs particulate emission (PE)/hr 20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1-4 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1 of the terms and conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

1.b Emission Limitation:
3.02 lbs PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying a maximum outlet concentration of 0.03 grain PE/scf* by the total maximum volumetric air flow rate (3,410 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
shotblast unit (SB8), with baghouse	OAC rule 3745-31-05 PTI #03-1542	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: Pneumatic Ash Conveying and Storage System (P017)

Activity Description: The pneumatic ash conveying and storage system carries fly and bottom ash from Boiler #'s 4, 5, and 6 to a storage silo. In addition, this system carries particulate collected by the baghouse which serves Boiler #'s 4, 5, and 6 to the storage silo. Ash which has been deposited into the storage silo is then unloaded in trucks and hauled away. Particulate emissions generated due to

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pneumatic ash conveying and collection system, powerhouse ash system, with baghouse	OAC rule 3745-17-11 (B)(1) OAC rule 3745-17-07 (A)	5.7 lbs particulate emissions (PE)/hr 20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1-4 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1 of the terms and conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
5.7 pounds PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with this limitation by multiplying a maximum outlet concentration of 0.03 grain PE/scf* by the total maximum volumetric air flow rate (1,500 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1979 without first applying for and obtaining a permit to install, in violation of OAC rule Chapter 3745-31. Therefore, the permittee shall perform the following in order to bring this emissions unit into compliance:
 - a. Submit a complete PTI application within 2 months following the issuance of this permit; and
 - b. Obtain a PTI within 8 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: SB9 Pangborn Shot Blast Machine (P019)

Activity Description: The SB9 Abrasive Blast Unit removes scale and rust from large armor plates. This is accomplished by conveying the steel plate through a blast enclosure where shot is propelled via centrifugal wheel blast. Particulate emissions due to operation of the SB9 Abrasive Blast Unit are controlled by a single cartridge filter unit.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pangborn shotblast unit (SB9), with baghouse	OAC rule 3745-17-11 (B)(1)	52.4 lbs particulate emission (PE)/hr
	OAC rule 3745-17-07 (A)	20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1.5-5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1 of the terms and conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

1.b Emission Limitation:
52.4 lbs PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying a maximum outlet concentration of 0.02 grain PE/scf* by the total maximum volumetric air flow rate (9,000 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pangborn shotblast unit (SB9), with baghouse	OAC rule 3745-31-05 PTI #03-13218	1.54 lbs PE/hr

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

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

Emission Limitation:
1.54 lbs PE/hour

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation by multiplying a maximum outlet concentration of 0.02 grain PE/scf* by the total maximum volumetric air flow rate (9,000 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: SB10 Pangborn Shot Blast Machine (P020)

Activity Description: The SB10 Abrasive Blast Unit removes scale and rust from small armor plates. This is accomplished by conveying the steel plate through a blast enclosure where shot is propelled via centrifugal wheel blast. Particulate emissions due to operation of the SB10 Abrasive Blast Unit are controlled by a single cartridge filter unit.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pangborn shotblast unit (SB10), with baghouse	OAC rule 3745-17-11 (B)(1)	45.6lbs particulate emission (PE)/hr
	OAC rule 3745-17-07 (A)	20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1.5-5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1 of the terms and conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

1.b Emission Limitation:
45.6 lbs PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying a maximum outlet concentration of 0.02 grain PE/scf* by the total maximum volumetric air flow rate (3,225 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pangborn shotblast unit (SB10), with baghouse	OAC rule 3745-31-05 PTI #03-13218	0.55 lb PE/hr

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

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

Emission Limitation:
1.54 lbs PE/hour

Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation by multiplying a maximum outlet concentration of 0.02 grain PE/scf* by the total maximum volumetric air flow rate (3,225 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 400 TPH Shotblast Media Airwash Separator, SB5 (P023)

Activity Description: The SB5 Abrasive Blast Room removes scale and rust from tank hulls and turrets prior to applying paint. This is accomplished by sealing each tank in an enclosed booth and propelling shot blast material at the structure via centrifugal blast wheels. Particulate emissions due to operation of the SB5 shot blast unit are controlled by two parallel baghouses (P002 and P023).

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
400 tons/hr shotblast media airwash separator, with baghouse	OAC rule 3745-17-11 (B)(1) OAC rule 3745-17-07 (A)	51.2 lbs particulate emission (PE)/hr 20% opacity, as a 6-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1.5-5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a weekly basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1 of the terms and conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

1.b Emission Limitation:
51.2 pounds PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with this limitation by multiplying a maximum outlet concentration of 0.02 grain PE/scf* by the total maximum volumetric air flow rate (6,000 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
400 tons/hr shotblast media airwash separator, with baghouse	OAC rule 3745-31-05 PTI #03-9669	0.77 lb PE/hr

2. Additional Terms and Conditions

- 2.a It has been determined that an inherent physical limitation of one tank per hour exists. An individual tank takes one half hour to process and one half hour to load-in and load-out. Therefore, it will be assumed that the unit only operates one half hour of every hour.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

Emission Limitation:
0.77 pound PE/hour

Applicable Compliance Method:
The permittee shall demonstrate compliance with this limitation by multiplying a maximum outlet concentration of 0.02 grain PE/scf* by the total maximum volumetric air flow rate (6,000 scfm), dividing by 7000, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the above particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

* Based on information supplied by the manufacturer

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: PA 1 Air Make Up Heater (Z004)

Activity Description: PA 1 Air Make Up is fired by natural gas and supplies process air to the structures paint line booth PA1.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10.7 mmBtu/hr natural gas-fired air make-up heater- PA1	OAC rule 3745-17-10 (B)(1) OAC rule 3745-17-07 (A)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, OAC Chapter 3745-18 is not applicable. Hence, there is no sulfur dioxide emission limitation for this emissions unit.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

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

V. Testing Requirements

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

- 1.a Emission Limitation:
20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

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

Applicable Compliance Method:

Compliance with the emission limitation of 0.020 lb PE/mmBtu shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,800 cu. ft./hr) by the AP-42 Fifth Edition, Table 1.4-1 (revised 7/98) emission factor for natural gas of 1.9 lbs PE (filterable)/mmscf and dividing by the maximum hourly heat input capacity of the emissions unit (10.7 mmBtu/hr).

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

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1980 without first applying for and obtaining a permit to install, in violation of OAC Chapter 3745-31. Therefore, the permittee shall perform the following in order to bring this emissions unit into compliance:
 - a. submit a complete PTI application within 2 months following the issuance of this permit; and
 - b. obtain a PTI within 8 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: PA 2 Air Make Up Heater (Z005)

Activity Description: PA 2 Air Make Up is fired by natural gas and supplies process air to the structures paint line booth PA2.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10.7 mmBtu/hr natural gas-fired air make-up heater- PA2	OAC rule 3745-17-10 (B)(1) OAC rule 3745-17-07 (A)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, OAC Chapter 3745-18 is not applicable. Hence, there is no sulfur dioxide emission limitation for this emissions unit.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

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

V. Testing Requirements

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

- 1.a Emission Limitation:
20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

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

Applicable Compliance Method:

Compliance with the emission limitation of 0.020 lb PE/mmBtu shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,800 cu. ft./hr) by the AP-42 Fifth Edition, Table 1.4-1 (revised 7/98) emission factor for natural gas of 1.9 lbs PE (filterable)/mmscf and dividing by the maximum hourly heat input capacity of the emissions unit (10.7 mmBtu/hr).

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

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1980 without first applying for and obtaining a permit to install, in violation of OAC Chapter 3745-31. Therefore, the permittee shall perform the following in order to bring this emissions unit into compliance:
 - a. submit a complete PTI application within 2 months following the issuance of this permit; and
 - b. obtain a PTI within 8 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: PA 5 Air Make Up Heater (Z006)

Activity Description: PA 5 Air Make Up is fired by natural gas and supplies process air to the structures paint line booth PA5.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10.7 mmBtu/hr natural gas-fired air make-up heater- PA5	OAC rule 3745-17-10 (B)(1) OAC rule 3745-17-07 (A)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, OAC Chapter 3745-18 is not applicable. Hence, there is no sulfur dioxide emission limitation for this emissions unit.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

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

V. Testing Requirements

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

- 1.a Emission Limitation:
20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

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

Applicable Compliance Method:

Compliance with the emission limitation of 0.020 lb PE/mmBtu shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,800 cu. ft./hr) by the AP-42 Fifth Edition, Table 1.4-1 (revised 7/98) emission factor for natural gas of 1.9 lbs PE (filterable)/mmscf and dividing by the maximum hourly heat input capacity of the emissions unit (10.7 mmBtu/hr).

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

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1980 without first applying for and obtaining a permit to install, in violation of OAC Chapter 3745-31. Therefore, the permittee shall perform the following in order to bring this emissions unit into compliance:
 - a. submit a complete PTI application within 2 months following the issuance of this permit; and
 - b. obtain a PTI within 8 months following the issuance of this permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Engine Hot Testing (Z010)

Activity Description: Tank turbine engines fired by JP 8 jet kerosene are tested in the engine hot test room. This engine testing follows a test protocol and runs the engine with no load other than that of the transmission.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2-cell, non-load, turbine engine test area	None	See A.I.2.a.

2. Additional Terms and Conditions

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

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2-cell, non-load, turbine engine test area	OAC rule 3745-31-05 PTI # 03-9871	1.62 lbs carbon monoxide(CO)/hr 0.22 lb organic compounds (OC)/hr 1.62 lbs nitrogen oxides (NOx)/hr 0.54 lb sulfur dioxide (SO2)/hr

See section B.II.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. Fuel usage in this emissions unit shall not exceed eight gallons per hour.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:
 - a. the number of gallons of fuel used;
 - b. the number of hours the emissions unit was in operation; and
 - c. the average hourly fuel usage rate (a divided by b), in gallons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average hourly fuel usage exceeded 8 gallons per hour, and the actual average hourly fuel usage rate for each such day. The report shall be submitted within 45 days after the deviation occurs.

V. Testing Requirements

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

- 1.a Emission Limitation:
1.62 lbs CO/hr

Applicable Compliance Method:
Compliance shall be demonstrated based on the following equation:

$$\text{CO (lbs/hr)} = \text{the average hourly fuel usage rate (from Section B.III.1.c above)} \times \text{the density of fuel used (6.76 lbs/gallon)} \times \text{an emission factor* of 30 lbs CO/1,000 lbs fuel used}$$

* This emission factor was supplied by the permittee.

V. Testing Requirements (continued)

1.b Emission Limitation:
0.22 lb OC/hr

Applicable Compliance Method:

Compliance shall be demonstrated based on the following equation:

OC (lbs/hr) = the average hourly fuel usage rate (from Section B.III.1.c above) X the density of fuel used (6.76 lbs/gallon) X an emission factor* of 4 lbs OC/1,000 lbs fuel used

* This emission factor was supplied by the permittee.

1.c Emission Limitation:
1.62 lbs NOx/hr

Applicable Compliance Method:

Compliance shall be demonstrated based on the following equation:

NOx (lbs/hr) = the average hourly fuel usage rate (from Section B.III.1.c above) X the density of fuel used (6.76 lbs/gallon) X an emission factor of 30 lbs NOx/1,000 lbs fuel used

* This emission factor was supplied by the permittee.

1.d Emission Limitation:
0.54 lb SO₂/hr

Applicable Compliance Method:

Compliance shall be demonstrated based on the following equation:

SO₂ (lbs/hr) = the average hourly fuel usage rate (from Section B.III.1.c above) X the density of fuel used (6.76 lbs/gallon) X an emission factor of 0.005 lb SO₂/1,000 lbs fuel used

* This emission factor was supplied by the permittee.

VI. Miscellaneous Requirements

None

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