



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

07/27/01

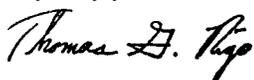
RE: Proposed Title V Chapter 3745-77 Permit
03-22-02-0045
Delphi Chassis Systems - Sandusky Operations

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for Delphi Chassis Systems - Sandusky Operations, has been created in Ohio EPA's State Air Resources System (STARS) on 07/27/01, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,



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

cc: Northwest District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 07/27/01	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 03-22-02-0045 to:
 Delphi Chassis Systems - Sandusky Operations
 2509 Hayes Ave.
 Sandusky, OH 44870

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

B001 (Boiler #1) Boiler #1	K001 (PCL Coat Lanes #1,#2,#3) PCL Coat Lanes #1,#2,#3	R002 (Maintenance Paint Spray Booth) Maintenance Paint Spray Booth
B002 (Boiler #2) Boiler #2	K002 (PCL Coat Lanes #4,#5,#6) PCL Coat Lanes #4,#5,#6	
B003 (Boiler #3) Boiler #3	K003 (PCL Coat Lane GM10) PCL Coat Lane GM10	

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 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.8 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.

18. Insignificant Activity

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

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 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 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. Records Retention Requirements

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

4. Inspections and Information Requests

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

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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).

6. 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.

7. 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.

8. 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:

boiler #5 (B005), diesel dispensing tank (G101), gasoline dispensing tank (G102), PCL coating lane (K004), model shop graphite grinding (P003), maintenance motor repair shop (P005), maintenance tool welding (P007), tool grinding (P008), #2 Goff shotblaster (P025), overbunker coal system (P026), GM 10 lathe (P028), #1 Goff shotblaster (P037), #3 Goff shotblaster (P038), spindle bearing normalizing furnace #4 (P241), spindle bearing normalizing furnace #5 (P242), spindle bearing normalizing furnace #6 (P243), spindle bearing normalizing furnace #7 (P244), spindle bearing normalizing furnace #1 (P271), spindle bearing normalizing furnace #2 (P272), spindle bearing normalizing furnace #3 (P273), coal storage (Z001), maintenance cabinet blaster (Z002), maintenance cabinet blaster (Z003), maintenance cabinet blaster (Z004), maintenance cabinet blaster (Z005), maintenance cabinet blaster (Z006), black oxide coating (Z007), roads (Z008), ash handling (Z009), north wing - hub machine (Z010), north wing spindle hub machine (Z011), north wing spindle hub hone (Z012), north wing - E,F hub/spindle machining (Z013), south wing T-10 lathes (Z014), south wing spindle machines (Z015), flex lathes (Z016), low volume lathes (Z017), glass bead blasting (Z018), Lean II coating line (Z019); and water pump laser welder w/inert gases (Z020).

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 PTI for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #1 (B001)
Activity Description: Boiler #1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
74.9 mmBtu/hour, coal-fired boiler #1, with sidestream separator (baghouse) and multi-cyclone	OAC rule 3745-17-10(C)(2)	0.235 pound particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-18-28(E)	1.6 pounds sulfur dioxide/mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the sidestream separator (baghouse) shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.
- The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I of the terms and conditions of this permit.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be 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 daily basis.
- For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for ash content, sulfur content, and heat content.

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

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

3. Requirements for the Sampling and Analysis of the Coal Burned:

The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Director (the appropriate Ohio EPA District Office or local air agency).

- 4.** The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
- 5.** The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
- 6.** A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly 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. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
- 2.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record from Section A.III of the terms and conditions of this permit that shows a deviation of the allowable sulfur dioxide emission limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

IV. Reporting Requirements (continued)

3. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the appropriate Ohio EPA District Office or local air agency) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

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

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

4. The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar quarter in a manner prescribed by the Director.
5. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet and/or dry) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:
 - a. the total quantity of coal received in each shipment (tons);
 - b. the weighted* average ash content (percent) of the coal received during each calendar month;
 - c. the weighted* average sulfur content (percent) of the coal received during each calendar month;
 - d. the weighted* average heat content (Btu/pound) of the coal received during each calendar month; and
 - e. the weighted* average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received each calendar month.

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

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

V. Testing Requirements

1. Emission testing requirements: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within six months after permit issuance and approximately 2.5 years after permit issuance.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the allowable PE rate (0.235 pound/mmBtu of actual heat input).

V. Testing Requirements (continued)

- 1.c** The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.
- 1.d** The tests shall be conducted while the emissions unit is operating at or near its maximum capacity (i.e., at or above 90 percent of 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 Director (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 Director's (the appropriate Ohio EPA District Office or local air agency) 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (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 Director (the appropriate Ohio EPA District Office or local air agency).

- 3.** Compliance Methods Requirements: 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 method(s):

- 3.a** Emission Limitation:
0.235 pound PE/mmBtu of actual heat input

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

- 3.c** Emission Limitation:
1.6 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping required in Sections A.III.2 and 3 of the terms and conditions of this permit.

If required, the permittee shall demonstrate compliance with this emission limitation by using the method detailed in OAC rule 3745-18-04(D).

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 #2 (B002)
Activity Description: Boiler #2

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>
74.9 mmBtu/hour, coal-fired boiler #2, with sidestream separator (baghouse) and multi-cyclone	OAC rule 3745-17-10(C)(2)	0.235 pound particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-18-28(E)	1.6 pounds sulfur dioxide/mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the sidestream separator (baghouse) shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.
- The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I of the terms and conditions of this permit.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be 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 daily basis.
- For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for ash content, sulfur content, and heat content.

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

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

3. Requirements for the Sampling and Analysis of the Coal Burned:

The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Director (the appropriate Ohio EPA District Office or local air agency).

- 4.** The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
- 5.** The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
- 6.** A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly 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. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
- 2.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record from Section A.III of the terms and conditions of this permit that shows a deviation of the allowable sulfur dioxide emission limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

IV. Reporting Requirements (continued)

3. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the appropriate Ohio EPA District Office or local air agency) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

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

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

4. The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar quarter in a manner prescribed by the Director.
5. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet and/or dry) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:
 - a. the total quantity of coal received in each shipment (tons);
 - b. the weighted* average ash content (percent) of the coal received during each calendar month;
 - c. the weighted* average sulfur content (percent) of the coal received during each calendar month;
 - d. the weighted* average heat content (Btu/pound) of the coal received during each calendar month; and
 - e. the weighted* average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received each calendar month.

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

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

V. Testing Requirements

1. Emission testing requirements: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within six months after permit issuance and approximately 2.5 years after permit issuance.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the allowable PE rate (0.235 pound/mmBtu of actual heat input).

V. Testing Requirements (continued)

- 1.c** The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.
- 1.d** The tests shall be conducted while the emissions unit is operating at or near its maximum capacity (i.e., at or above 90 percent of 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 Director (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 Director's (the appropriate Ohio EPA District Office or local air agency) 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (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 Director (the appropriate Ohio EPA District Office or local air agency).

- 3.** Compliance Methods Requirements: 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 method(s):

- 3.a** Emission Limitation:
0.235 pound PE/mmBtu of actual heat input

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

- 3.c** Emission Limitation:
1.6 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping required in Sections A.III.2 and 3 of the terms and conditions of this permit.

If required, the permittee shall demonstrate compliance with this emission limitation by using the method detailed in OAC rule 3745-18-04(D).

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 #3 (B003)
Activity Description: Boiler #3

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>
74.9 mmBtu/hour, coal-fired boiler #3, with sidestream separator (baghouse) and multi-cyclone	OAC rule 3745-17-10(C)(2)	0.235 pound particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.
	OAC rule 3745-18-28(E)	1.6 pounds sulfur dioxide/mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the sidestream separator (baghouse) shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.
- The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I of the terms and conditions of this permit.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be 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 daily basis.
- For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received and the permittee's or coal supplier's analyses for ash content, sulfur content, and heat content.

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

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

3. Requirements for the Sampling and Analysis of the Coal Burned:

The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Director (the appropriate Ohio EPA District Office or local air agency).

- 4.** The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
- 5.** The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
- 6.** A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly 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. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
- 2.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record from Section A.III of the terms and conditions of this permit that shows a deviation of the allowable sulfur dioxide emission limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

IV. Reporting Requirements (continued)

3. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Director (the appropriate Ohio EPA District Office or local air agency) documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

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

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

4. The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar quarter in a manner prescribed by the Director.
5. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet and/or dry) for each shipment of coal which is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:
 - a. the total quantity of coal received in each shipment (tons);
 - b. the weighted* average ash content (percent) of the coal received during each calendar month;
 - c. the weighted* average sulfur content (percent) of the coal received during each calendar month;
 - d. the weighted* average heat content (Btu/pound) of the coal received during each calendar month; and
 - e. the weighted* average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received each calendar month.

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

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

V. Testing Requirements

1. Emission testing requirements: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within six months after permit issuance and approximately 2.5 years after permit issuance.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the allowable PE rate (0.235 pound/mmBtu of actual heat input).

V. Testing Requirements (continued)

- 1.c** The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.
- 1.d** The tests shall be conducted while the emissions unit is operating at or near its maximum capacity (i.e., at or above 90 percent of 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 Director (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 Director's (the appropriate Ohio EPA District Office or local air agency) 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (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 Director (the appropriate Ohio EPA District Office or local air agency).

- 3.** Compliance Methods Requirements: 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 method(s):

- 3.a** Emission Limitation:
0.235 pound PE/mmBtu of actual heat input

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

- 3.c** Emission Limitation:
1.6 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping required in Sections A.III.2 and 3 of the terms and conditions of this permit.

If required, the permittee shall demonstrate compliance with this emission limitation by using the method detailed in OAC rule 3745-18-04(D).

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: PCL Coat Lanes #1,#2,#3 (K001)

Activity Description: PCL Coat Lanes #1,#2,#3

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>
PCL coating lanes #1, #2 and #3, with dry oven (miscellaneous metal parts coating line)	OAC rule 3745-21-09 (U)(1)(i)	3.0 pounds volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	none (Refer to section A.I.2.a of the terms and conditions of this permit.)
	OAC rule 3745-17-07(A)	none (Refer to section A.I.2.b of the terms and conditions of this permit.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Erie County, which is identified as a P-3 county.
- 2.b This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

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 pounds/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.)

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.

V. Testing Requirements

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

Emission Limitation:

3.0 pounds VOC/gallon of coating (excluding water and exempt solvents)

Applicable Compliance Method:

The permittee shall demonstrate compliance based upon the record keeping required in Section A.III.1 of the terms and conditions of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids content, or density of the coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

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>
PCL coating lanes #1, #2 and #3 with dry oven (misc. metal parts coating line)	OAC rule 3745-31-05 (PTI No. 03-9842)	for the coatings usage, 1.5 pounds volatile organic compounds (VOC)/hour, 6.57 tons VOC/year 0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year Visible emissions shall not exceed 0% opacity, as a six-minute average. for the cleanup materials usage, 322.5 pounds OC/month, 1.94 tons OC/year

2. Additional Terms and Conditions

- 2.a The 1.5 pounds/hour and 6.57 tons/year VOC emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds/gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions for each cleanup material employed, in pounds; and
 - e. the total OC emissions for all the cleanup materials employed [summation of (c x d) for all cleanup materials], in pounds.

Note: The permittee may also calculate the monthly OC emission rate in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

monthly OC emissions from cleanup operations (pounds/month) = summation of [(Ai-Bi) X di] for i = 1 to n

where:

i = 1, 2, 3,...n

n = the total number of different types of cleanup materials employed

Ai = the number of gallons of cleanup material i consumed (gallons/month)

Bi = the number of gallons of cleanup material i sent off site for disposal or reclamation, minus solids content of said material (gallons/month)

di = density of cleanup material i, in pounds/gallon

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation of 322.5 pounds (for the cleanup materials usage). The reports shall be submitted in accordance with paragraph A.3.b of the General Terms and Conditions of this permit.

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 Limitations:
1.5 pounds VOC/hour, 6.57 tons/year (for the coatings usage)

Applicable Compliance Method:

Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum coatings usage rate (gallons/hour) by the maximum VOC content of all the coatings (pounds VOC/gallon).

Compliance with the annual allowable VOC emission limitation shall be assumed as long as compliance with the hourly allowable VOC emission limitation is maintained (the annual VOC emission limitation was calculated by multiplying the hourly VOC emission limitation by 8760, and then dividing by 2000).

V. Testing Requirements (continued)

- 1.b** Emission Limitations:
322.5 pounds OC/month and 1.94 tons OC/year

Applicable Compliance Method:

Compliance with the monthly allowable OC emission limitation shall be based upon the record keeping required in Section B.III.1 of the terms and conditions of this permit.

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping required in Section B.III.1 and shall be the summation of the 12 monthly OC emission rates for the calendar year, divided by 2000.

- 1.c** Emission Limitations:
0.10 pound PE/hour and 0.44 ton PE/year

Applicable Compliance Method:

The permittee shall determine compliance with the hourly allowable PE limitation above by utilizing the following equation:

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

where:

E = PE rate (pounds/hour).

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.

CE = Control efficiency of the control equipment (filters).

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the visible emissions limitation by using Method 9, which is located in 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: PCL Coat Lanes #4,#5,#6 (K002)
Activity Description: PCL Coat Lanes #4,#5,#6

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>
PCL coating lanes #4, #5 and #6, with dry oven (miscellaneous metal parts coating line)	OAC rule 3745-21-09 (U)(1)(i)	3.0 pounds volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	none (Refer to section A.I.2.a of the terms and conditions of this permit.)
	OAC rule 3745-17-07(A)	none (Refer to section A.I.2.b of the terms and conditions of this permit.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Erie County, which is identified as a P-3 county.
- 2.b This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

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 pounds/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.)

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.

V. Testing Requirements

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

Emission Limitation:

3.0 pounds VOC/gallon of coating (excluding water and exempt solvents)

Applicable Compliance Method:

The permittee shall demonstrate compliance based upon the record keeping required in Section A.III.1 of the terms and conditions of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids content, or density of the coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

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>
PCL coating lanes #4, #5 and #6, with dry oven (miscellaneous metal parts coating line)	OAC rule 3745-31-05 (PTI No. 03-9842)	<p>for the coatings usage, 1.5 pounds volatile organic compounds (VOC)/hour, 6.57 tons VOC/year</p> <p>0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year</p> <p>Visible emissions shall not exceed 0% opacity, as a six-minute average.</p> <p>for the cleanup materials usage, 322.5 pounds OC/month, 1.94 tons OC/year</p>

2. Additional Terms and Conditions

- 2.a The 1.5 pounds/hour and 6.57 tons/year VOC emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds/gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions for each cleanup material employed, in pounds; and
 - e. the total OC emissions for all the cleanup materials employed [summation of (c x d) for all cleanup materials], in pounds.

Note: The permittee may also calculate the monthly OC emission rate in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

monthly OC emissions from cleanup operations (pounds/month) = summation of [(Ai-Bi) X di] for i = 1 to n

where:

i = 1, 2, 3,...n

n = the total number of different types of cleanup materials employed

Ai = the number of gallons of cleanup material i consumed (gallons/month)

Bi = the number of gallons of cleanup material i sent off site for disposal or reclamation, minus solids content of said material (gallons/month)

di = density of cleanup material i, in pounds/gallon

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation of 322.5 pounds (for the cleanup materials usage). The reports shall be submitted in accordance with paragraph A.3.b of the General Terms and Conditions of this permit.

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 Limitations:
1.5 pounds VOC/hour, 6.57 tons/year (for the coatings usage)

Applicable Compliance Method:

Compliance with the hourly allowable emission limitation shall be determined by multiplying the maximum coatings usage rate (gallons/hour) by the maximum VOC content of all the coatings (pounds VOC/gallon).

Compliance with the annual allowable VOC emission limitation shall be assumed as long as compliance with the hourly allowable VOC emission limitation is maintained (the annual VOC emission limitation was calculated by multiplying the hourly VOC emission limitation by 8760, and then dividing by 2000).

V. Testing Requirements (continued)

- 1.b** Emission Limitations:
322.5 pounds OC/month and 1.94 tons OC/year

Applicable Compliance Method:

Compliance with the monthly allowable OC emission limitation shall be based upon the record keeping required in Section B.III.1 of the terms and conditions of this permit.

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping required in Section B.III.1 and shall be the summation of the 12 monthly OC emission rates for the calendar year, divided by 2000.

- 1.c** Emission Limitations:
0.10 pound PE/hour and 0.44 ton PE/year

Applicable Compliance Method:

The permittee shall determine compliance with the hourly allowable PE limitation above by utilizing the following equation:

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

where:

E = PE rate (pounds/hour).

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.

CE = Control efficiency of the control equipment (filters).

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the visible emissions limitation by using Method 9, which is located in 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: PCL Coat Lane GM10 (K003)
Activity Description: PCL Coat Lane GM10

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>
PCL coating lane GM 10, with dry oven (misc. metal parts coating line)	OAC rule 3745-21-09 (U)(1)(i)	3.0 pounds volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)	none (Refer to section A.I.2.a of the terms and conditions of this permit.)
	OAC rule 3745-17-07(A)	none (Refer to section A.I.2.b of the terms and conditions of this permit.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Erie County, which is identified as a P-3 county.
- 2.b This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

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 pounds/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.)

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.

V. Testing Requirements

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

Emission Limitation:

3.0 pounds VOC/gallon of coating (excluding water and exempt solvents)

Applicable Compliance Method:

The permittee shall demonstrate compliance based upon the record keeping required in Section A.III.1 of the terms and conditions of this permit.

Any determination of VOC content (VOC means all volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids content, or density of the coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

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>
PCL coating lane GM 10, with dry oven (misc. metal parts coating line)	OAC rule 3745-31-05 (PTI No. 03-9842)	<p>for the coatings usage, 1.5 pounds volatile organic compounds (VOC)/hour, 6.57 tons VOC/year</p> <p>0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year</p> <p>Visible emissions shall not exceed 0% opacity, as a six-minute average.</p> <p>for the cleanup materials usage, 322.5 pounds OC/month, 1.94 tons OC/year</p>

2. Additional Terms and Conditions

- 2.a The 1.5 pounds/hour and 6.57 tons/year VOC emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the following information each month for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds/gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emissions for each cleanup material employed, in pounds; and
 - e. the total OC emissions for all the cleanup materials employed [summation of (c x d) for all cleanup materials], in pounds.

Note: The permittee may also calculate the monthly OC emission rate in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

monthly OC emissions from cleanup operations (pounds/month) = summation of [(Ai-Bi) X di] for i = 1 to n

where:

i = 1, 2, 3,...n

n = the total number of different types of cleanup materials employed

Ai = the number of gallons of cleanup material i consumed (gallons/month)

Bi = the number of gallons of cleanup material i sent off site for disposal or reclamation, minus solids content of said material (gallons/month)

di = density of cleanup material i, in pounds/gallon

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation of 322.5 pounds (for the cleanup materials usage). The reports shall be submitted in accordance with paragraph A.3.b of the General Terms and Conditions of this permit.

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 Limitations:
1.5 pounds VOC/hour, 6.57 tons/year (for the coatings usage)

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined by multiplying the maximum coatings usage rate (gallons/hour) by the maximum VOC content of all the coatings (pounds VOC/gallon).

Compliance with the annual allowable VOC emission limitation shall be assumed as long as compliance with the hourly allowable VOC emission limitation is maintained (the annual VOC emission limitation was calculated by multiplying the hourly VOC emission limitation by 8760, and then dividing by 2000).

V. Testing Requirements (continued)

- 1.b** Emission Limitations:
322.5 pounds OC/month and 1.94 tons OC/year

Applicable Compliance Method:

Compliance with the monthly allowable OC emission limitation shall be based upon the record keeping required in Section B.III.1 of the terms and conditions of this permit.

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping required in Section B.III.1 and shall be the summation of the 12 monthly OC emission rates for the calendar year, divided by 2000.

- 1.c** Emission Limitations:
0.10 pound PE/hour and 0.44 ton PE/year

Applicable Compliance Method:

The permittee shall determine compliance with the hourly allowable PE limitation above by utilizing the following equation:

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

where:

E = PE rate (pounds/hour).

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.

CE = Control efficiency of the control equipment (filters).

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with Methods 1 - 5, which are located in 40 CFR, Part 60, Appendix A.

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the visible emissions limitation by using Method 9, which is located in 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Maintenance Paint Spray Booth (R002)
Activity Description: Maintenance Paint Spray Booth

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Erie County, which is identified as a P-3 county.
- 2.b This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all the coatings employed.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

V. Testing Requirements

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

Emission Limitation:

coatings usage shall not exceed 10 gallons/day

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping required in Section A.III.1 of the terms and conditions of this permit.

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

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