



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

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

Mailing Address:

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

03/28/03

**CERTIFIED MAIL**

**RE: Preliminary Proposed Title V  
Chapter 3745-77 permit**

01-65-01-0026  
GE Circleville Lamp Plant  
Michelle Culpepper  
General Electric-Circleville Lamp Plant  
559 East Ohio Street  
Circleville, OH 43113

Dear Michelle Culpepper:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 08/22/01. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency  
Jim Orlemann, Manager, Engineering Section  
Division of Air Pollution Control  
P.O.Box 1049  
Columbus, OH 43216-1049

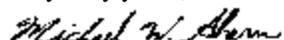
and

Central District Office  
3232 Alum Creek Drive  
PO Box 1049  
Columbus, OH 43216-1049  
(614) 728-3778

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

  
Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Central District Office

File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 03/28/03

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 01-65-01-0026 to:

GE Circleville Lamp Plant
General Electric-Circleville Lamp Plant
559 East Ohio Street
Circleville, OH 43113

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units like B004, P007, P014, P019, P020, P029, P031, P045, P046, P047, P901, R001, R002, R003, R005, R006, R007, R010, R011, R012, R013, R014, and R015.

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.

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

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **Monitoring and Related Record Keeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
  
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
  
- c. The permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*
  
  - ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**
    - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation

occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))*

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))*

**iii. For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and

duration of each deviation. 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, record keeping, 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.

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

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

## **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 of any emissions unit(s) 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 OAC rule 3745-15-06, 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).

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

## **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.

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

## **4. Title IV Provisions**

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

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

## **5. Severability Clause**

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

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

## **6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

## **7. Fees**

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

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

## **8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

## **9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

## **10. Reopening for Cause**

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

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

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## **11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

## **12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

- i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

**13. Permit Shield**

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

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

**14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

**15. Emergencies**

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

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

**16. Off-Permit Changes**

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant 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.
- 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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

#### **17. Compliance Method Requirements**

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

*(This term is provided for informational purposes only.)*

#### **18. Insignificant Activities**

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

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

#### **19. Permit to Install Requirement**

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

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

**20. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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.)

**2. Records Retention Requirements**

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

**3. Inspections and Information Requests**

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

**4. Scheduled Maintenance/Malfunction Reporting**

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

**5. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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

If no 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 Enforceable Section

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.
2. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61 and OAC Chapter 3745-20.

### B. State Only Enforceable Section

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

B001 - 3.35 mmBtu/hr, natural gas boiler;  
B002 - bulb prep area;  
B003 - 2.1 mmBtu/hr, natural gas boiler;  
B005 - 7.1 mmBtu/hr, natural gas heater;  
B006 - 2.1 mmBtu/hr, natural gas boiler;  
B007 - fire water diesel pump;  
B008 - DF heater no. 1, fan room #6;  
B009 - DF heater fan room #11;  
B010 - DF heater fan #1 room #8;  
B011 - DF heater no. 2, fan room #6;  
B012 - DF heater fan #2 room #8;  
F001 - paved parking lots and driveways;  
K001 - basefill machine 1;  
K002 - basefill machine 2;  
K003 - basefill machine 3;  
K004 - basefill machine 4;  
K005 - basefill machine 5;  
K006 - basefill machine 6;  
K007 - basefill machine 7;  
L001 - shop solvent degreasing;  
L003 - shop solvent degreasing;  
L005 - nitro clean tank;  
L006 - shop solvent degreasing;  
L007 - basefill solvent parts cleaner;  
P002 - group No. 5 (Hitachi Circline) assembly operations;  
P004 - group No. 18;  
P005 - coiling operations;  
P008 - specialty lehr 1;  
P011 - group No. 5 (Hitachi Circline) coater;  
P012 - wastewater pretreatment;  
P013 - water coating mix rooms;  
P016 - LWBXI coater;  
P017 - HLBX including grit blaster;  
P018 - reclamation furnace;  
P021 - bi-ax mix room;  
P022 - tank farm;  
P023 - flare machines;  
P024 - group No. 16;  
P025 - group No. 25;  
P026 - group No. 26;

**B. State Only Enforceable Section (continued)**

P027 - nitro based coating mixing room;  
P028 - base cement mixing;  
P030 - group No. 21;  
P033 - mercury cleaning;  
P034 - aqueous strip cleaning;  
P035 - LWBXII coater;  
P037 - HLXI coater;  
P038 - group No. 4;  
P039 - group No. 7;  
P040 - group No. 10;  
P041 - group No. 11;  
P042 - group No. 22;  
P043 - group No. 24;  
P044 - group No. 17;  
P045 - miscellaneous chemical usage;  
P046 - group 14 sandblast;  
P047 - group 15 sandblast;  
P048 - group 21 sandblast;  
P049 - wastewater treatment plant sandblast;  
P050 - coating department sand blast;  
R008 - case sealers (2);  
T001 - HCL acid tank;  
T008 - mixed acid tank;  
T010 - coating thinner tank; and  
T011 - synasol tank.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

2. Air dispersion modeling was conducted on 2/18/92, for emissions units which have the potential to emit mercury air emissions. Emissions units included in the modeling were P014-bulb crusher, P020-group 15, P030-group 21 and the central vacuum system which serves emissions units P038-group 4, P039-group 7, P040-group 10, P041-group 11, P042-group 22, P043-group 24, P044-group 17. These emissions units were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of their exhaust systems, as specified by the permittee in a permit to install application or in correspondence with the permittee. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for mercury emitted by these emissions units using data from permit to install applications, correspondence and/or the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Mercury

TLV (mg/m<sup>3</sup>): 0.05

Maximum Hourly Emission Rate (lbs/hr): 0.0174

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 0.85

MAGLC (ug/m<sup>3</sup>): 1.2

Physical changes to or changes in the method of operation of an emissions unit referenced above shall undergo an evaluation to determine if the changes satisfy the "Air Toxics Policy".

**B. State Only Enforceable Section (continued)**

3. Air dispersion modeling was conducted on 9/17/91 for emissions units R001-downflush coater 6, R002-downflush coater 10, R003-downflush coater 12, R005-downflush coater 8, R006-downflush coater 11, R007-downflush coater 15, P007-upflush coater 5, P016-LWBXI coater, P017-HLBX coater and P019-coater 14. These emissions units were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in a permit to install application or correspondence to the permittee. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application, correspondence and/or the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (mg/m<sup>3</sup>): 17

Maximum Hourly Emission Rate (lbs/hr): 18.12

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 274

MAGLC (ug/m<sup>3</sup>): 405

Pollutant: Monoethanol Amine (MEA)

TLV (mg/m<sup>3</sup>): 7.5

Maximum Hourly Emission Rate (lbs/hr): 9.90

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 149

MAGLC (ug/m<sup>3</sup>): 179

Physical changes to or changes in the method of operation of an emissions unit referenced above shall undergo an evaluation to determine if the changes satisfy the "Air Toxics Policy".

**B. State Only Enforceable Section (continued)**

4. Air dispersion modeling was conducted on 10/28/92 for emissions units R010 - upflush room coater #6, R011 - upflush room coater #10, R012 - upflush room coater #11, R013 - upflush room coater #12, and R014 - upflush room coater #13. These emissions units were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2- Ethoxyethanol

TLV (mg/m<sup>3</sup>): 18

Maximum Hourly Emission Rate (lbs/hr): 1.84

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1.37

MAGLC (ug/m<sup>3</sup>): 240.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** DF htr. fan room #4 (B004)  
**Activity Description:** 11.2 mmBtu/hr natural gas fired room air heater

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
11.2 mmBtu/hr natural gas (direct-fired) room air heater	OAC rule 3745-31-05(A)(3) (PTI 01-4250)	Nitrogen oxides emissions shall not exceed 1.1 pounds per mmBtu heat input.
		Carbon monoxide emissions shall not exceed 0.9 pound per mmBtu heat input.
	OAC rule 3745-17-11(B)(1)	None, see A.I.2.a below.
	OAC rule 3745-17-07(A)	None, see A.I.2.b below.
	OAC rule 3745-21-08(B)	See A.I.2.c below.
	OAC rule 3745-23-06(B)	See A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE)\* 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 process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

\* The burning of natural gas is the only source of PE from this emissions unit.

- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.c The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 01-4250.

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

## **2. Additional Terms and Conditions (continued)**

- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 01-4250.

## **II. Operational Restrictions**

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

## **III. Monitoring and/or Record Keeping Requirements**

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

## **IV. Reporting Requirements**

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

## **V. Testing Requirements**

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

- 1.a** Emission Limitation -  
Nitrogen oxides emissions shall not exceed 1.1 pounds per mmBtu heat input.

Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 100 lbs NOx/mmcu.ft. (AP-42, section 1.4, 1998) by the maximum throughput of 10,695 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 7.

- 1.b** Emission Limitation -  
Carbon monoxide emissions shall not exceed 0.9 pound per mmBtu heat input.

Applicable Compliance Method -

Compliance may be demonstrated by dividing the emission factor for natural gas combustion of 84 lbs CO/mmcu.ft. (AP-42, section 1.4, 1998) by the maximum throughput of 10,695 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 10.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

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

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Upflush coater #5 (P007)

**Activity Description:** Upflush coater # 5 with drying oven; 10 mmBtu/hr; non-insignificant for ammonia

#### 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>
upflush coater #5 with 10 mmBtu/hr natural gas-fired drying oven	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-17-11(B)(1)	None, see A.I.2.b below.
	OAC rule 3745-17-07(A)	None, see A.I.2.c below.
	OAC rule 3745-18-06(E)(2)	Sulfur dioxide emissions shall not exceed 33.9 pounds/hour. See A.V.1 below.

##### 2. Additional Terms and Conditions

- 2.a To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b The uncontrolled mass rate of particulate emissions (PE)\* 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 process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

\* The burning of natural gas is the only source of PE from this emissions unit.

- 2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

#### II. Operational Restrictions

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

#### III. Monitoring and/or Record Keeping Requirements

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

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

2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

### **V. Testing Requirements**

1. Emission Limitation:  
Sulfur dioxide emissions shall not exceed 33.9 pounds/hour.

Applicable Compliance Method:

Compliance with this emission limitation may be assumed since the emissions unit's potential to emit for sulfur dioxide emissions (sum of the emissions from the firing of natural gas and the coating(s)) is less than the allowable emission limitation established by the applicable rule.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

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

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Bulb crusher (P014)  
**Activity Description:** Crush reject bulbs and lamps and store in a silo

#### 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>
bulb crusher / MRT system with fabric filters and carbon adsorption units	OAC rule 3745-31-05(A)(3) (PTI 01-8614)	Particulate emissions shall not exceed 1.2 pounds per hour and 5.3 tons per year.  Mercury emissions shall not exceed 0.0036 pound per hour and 0.02 ton per year.  See A.I.2.a.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).  Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The particulate emission limitation specified in this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

## 2. Additional Terms and Conditions

2.a Best available technology (BAT) for this emissions unit has been determined to be the following:

i. for the chopper hopper and the crusher: use of a control system consisting of a fabric filter (hose filter) followed by a carbon adsorption unit; and

ii. for the sieve and silo: use of a control system consisting of a cyclone followed by a fabric filter (hose filter) and carbon adsorption unit.

The control systems for the chopper hopper, crusher, sieve and silo shall achieve an overall control efficiency of 99.5% and 100% capture efficiency for PE and Hg.

## II. Operational Restrictions

1. Emissions from the chopper hopper and the crusher shall be vented to a fabric filter (hose filter) followed by a carbon adsorption unit whenever this emission unit is crushing bulbs. Emissions from the sieve and silo shall be vented to a cyclone and fabric filter (hose filter) followed by a carbon adsorption unit whenever this emission unit is crushing bulbs.
2. The pressure drop across each fabric filter (hose filter) shall be maintained within the range of 0.2 to 4 inches of water while the emissions unit is in operation.
3. The pressure drop across each carbon adsorber shall be maintained within the range of 1 to 8 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each fabric filter (hose filter) while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) or good engineering practice. The permittee shall record the pressure drop across each fabric filter (hose filter) on a daily basis.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Central District Office, compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using US EPA - approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each carbon adsorber while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each carbon adsorber on a daily basis.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Central District Office, compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using US EPA - approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.

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

3. The permittee shall perform daily checks when the emissions unit is in operation, and when the weather conditions allow, for any visible particulate emissions (excluding uncombined water vapor) from the cyclone/fabric filter (hose filter) and carbon adsorption/fabric filter (hose filter) units serving this emissions unit. The presence or absence of any visible particulate emissions shall be recorded electronically or in an operations log. If visible particulate emissions are observed, the permittee shall also record the following:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
4. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #01-8614, issued on June 11, 2002: Section A.III. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - i. identification of all periods of time during which the pressure drop across either fabric filter (hose filter) did not comply with the allowable range specified above; and
  - ii. identification of all periods of time during which the pressure drop across either carbon adsorber did not comply with the allowable range specified in above.

The 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 submit quarterly deviation (excursion) reports that identify all days during which any visible particulate emissions were observed from the cyclone/fabric filter (hose filter) and/or the carbon adsorption/fabric filter (hose filter) stack(s) serving this emissions unit and describe any corrective actions taken to eliminate the visible particulate emissions.

The deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

### **V. Testing Requirements**

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:  
Particulate emissions shall not exceed 1.2 pounds per hour.

Applicable Compliance Method:

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for particulate emissions;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for particulate emissions: Methods 1 through 5, 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA; and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

**1.b** Emission Limitation:  
Particulate emissions shall not exceed 5.3 tons per year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the lb per hour limitation (1.2 lbs PE/hr) by a maximum operating schedule of 8,760 hours per year and dividing by a conversion factor of 2000 lbs per ton. Therefore, provided compliance is demonstrated with the lb per hour limitation, compliance with the ton per year limitation will also be demonstrated.

**1.c** Emission Limitation:  
Mercury emissions shall not exceed 0.0036 pound per hour.

Applicable Compliance Method:

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for mercury;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for mercury: Methods 1 through 4 and 29, 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA; and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

## **V. Testing Requirements (continued)**

- 1.d** Emission Limitation:  
Mercury emissions shall not exceed 0.02 ton per year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the lb per hour limitation (0.0036 lb Hg/hr) by a maximum operating schedule of 8,760 hours per year and dividing by a conversion factor of 2000 lbs per ton. Therefore, provided compliance is demonstrated with the lb per hour limitation, compliance with the ton per year limitation will also be demonstrated.

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

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC 3745-17-03(B)(1).

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
bulb crusher with baghouse		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit P014 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Mercury

TLV (mg/m3): 0.025

Maximum Hourly Emission Rate (lbs/hr): 0.0036

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.21

MAGLC (ug/m3): 0.6

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

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

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Group No. 14 (P019)

**Activity Description:** Medium speed horizontal assembly line #14 with coater and lehr

#### 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>
lamp assembly line - group 14 with carbon adsorption unit	OAC rule 3745-31-05(A)(3) (PTI 01-3454)	<p>Particulate emissions shall not exceed 0.09 pound per hour.</p> <p>Sulfur dioxide emissions shall not exceed 0.85 pound per hour.</p> <p>Nitrogen oxides emissions shall not exceed 2.10 pounds per hour.</p> <p>Carbon monoxide emissions shall not exceed 0.40 pound per hour.</p> <p>Organic compound emissions shall not exceed 3.20 pounds per hour.</p> <p>Ammonia emissions shall not exceed 2.70 pounds per hour.</p> <p>Mercury emissions shall not exceed 0.0006 pound per hour.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p> <p>See A.I.2.d through A.I.2.h below.</p> <p>The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).</p>
	OAC rule 3745-17-11(B)(1) OAC rule 3745-18-06(E)(2)	

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-21-09(Y)	See A.I.2.b below.
	OAC rule 3745-21-09(U)	See A.I.2.c below.

## 2. Additional Terms and Conditions

- 2.a** The materials employed in this emissions unit neither come in contact with flame nor are baked, heat-cured, or heat-polymerized, in the presence of oxygen. Therefore, OAC rule 3745-21-07(G)(1) does not apply to this emissions unit.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b** Pursuant to OAC rule 3745-21-09(Y)(2)(b), this emissions unit is exempt from the emission limitations specified in OAC rule 3745-21-09(Y) because the maximum potential usage of inks from all printing lines at this facility (P019) is less than 148 tons per year.
- 2.c** Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-09(U)(1)(d) because the emissions unit never uses more than 10 gallons per day.
- 2.d** The permittee shall use water-based coatings at all times this emissions unit is in operation.
- "Water-based coatings" shall be defined as a material in which the water content of the volatile fraction is at least 95%, by weight.
- 2.e** The permittee shall vent all mercury emissions from this emissions unit to a carbon adsorption unit.
- 2.f** The permittee shall maintain the carbon adsorption system controlling the central vacuum system which serves emissions units P038-group 4, P039-group 7, P040-group 10, P041-group 11, P029-group 12, P019-group 14, P024-group 16, P044-group 17, P004-group 18, P042-group 22, P043-group 24, P025-group 25 and P026-group 26 at a control efficiency of at least 90% for mercury and a mercury emission rate of less than 0.0196 pound per hour at all times.
- 2.g** The permittee shall maintain tight fitting covers on the coating mixing tanks except that no hose opening shall have a diameter more than 1.5 inches greater than the outside diameter of the hose to be situated in the opening.
- 2.h** The pound(s) per hour emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

## II. Operational Restrictions

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

## **II. Operational Restrictions (continued)**

2. The maximum daily coating usage for this emissions unit shall not exceed 10 gallons.
3. The permittee shall use only waterbased coatings in this emissions unit.

## **III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain a log identifying the dates when the carbon, used in the carbon adsorber serving this emissions unit, is replaced.
3. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
4. The permittee shall maintain daily records of the total coating usage in this emissions unit.
5. For each day during which the permittee uses a coating other than a waterbased coating, as defined in A.I.2.d, the permittee shall maintain a record of the type, quantity, and composition of each such non-waterbased coating used in this emissions unit.

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.
3. The permittee shall submit annual reports which identify any exceedances of the daily coating usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit deviation (excursion) reports that identify each day when a coating other than a waterbased coating was used in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation -  
Particulate emissions shall not exceed 0.09 pound per hour.

### **Applicable Compliance Method -**

Compliance may be demonstrated by multiplying the emission factor for total particulates from natural gas combustion of 1.9 lbs PE/mm<sup>3</sup>.ft. (AP-42, 1.4, 1998) by the maximum lehr throughput of 6,447 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

## V. Testing Requirements (continued)

- 1.b** Emission Limitation -  
Sulfur dioxide emissions shall not exceed 0.85 pound per hour.

Applicable Compliance Methods -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for natural gas combustion of 0.6 lb SO<sub>2</sub>/mmcu.ft. (AP-42, 1.4, 1998) by the maximum dryer throughput of 6,447 cu.ft./hr.

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for sulfur dioxide;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for sulfur dioxide: Methods 1 through 4 and 6, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

- 1.c** Emission Limitation -  
Nitrogen oxides emissions shall not exceed 2.10 pounds per hour.

Applicable Compliance Method -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for natural gas combustion of 100 lbs NO<sub>x</sub>/mmcu.ft. (AP-42, 1.4, 1998) by the maximum dryer throughput of 6,447 cu.ft./hr.

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for nitrogen oxides;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for nitrogen oxides: Methods 1 through 4 and 7, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

## **V. Testing Requirements (continued)**

### **1.d Emission Limitation -**

Carbon monoxide emissions shall not exceed 0.40 pound per hour.

#### Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 84 lbs CO/mm<sup>3</sup>cu.ft. (AP-42, 1.4, 1998) by the maximum dryer throughput of 6,447 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

### **1.e Emission Limitation -**

Organic compound emissions shall not exceed 3.20 pounds per hour.

#### Applicable Compliance Methods -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for natural gas combustion of 5.5 lbs VOC/mm<sup>3</sup>cu.ft. (AP-42, 1.4 1998) by the maximum dryer throughput of 6,447 cu.ft./hr.

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for organic compounds;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for organic compounds: Methods 1 through 4 and 18, 25 or 25A, as appropriate, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

**V. Testing Requirements (continued)**

**1.f** Emission Limitation -  
Mercury emissions shall not exceed 0.0006 pound per hour.

Applicable Compliance Method -

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

- i. the emission testing shall be conducted on a quarterly basis;
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for mercury;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for mercury and demonstrate compliance by emission testing as specified in Section A.V.1.i: Methods 1 through 4 and 101, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

**1.g** Emission Limitation -  
Ammonia emissions shall not exceed 2.70 pounds per hour.

Applicable Compliance Method -

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

- i. the emission testing shall be conducted annually;
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for ammonia;
- iii. the permittee shall demonstrate compliance with the hourly allowable mass emission rate for ammonia by emission testing in accordance with U.S. EPA-approved test methods; and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

**1.h** Emission Limitation -  
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

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

## **V. Testing Requirements (continued)**

### **1.i Emission Limitation -**

The carbon adsorption system controlling the central vacuum system which serves emissions units P038-group 4, P039-group 7, P040-group 10, P041-group 11, P029-group 12, P019-group 14, P024-group 16, P044-group 17, P004-group 18, P042-group 22, P043-group 24, P025-group 25, and P026-group 26 shall maintain a control efficiency of at least 90% for mercury and a mercury emission rate of less than 0.0196 pound per hour at all times.

### **Applicable Compliance Method -**

If required, the permittee shall conduct, or have conducted, emission testing for these emissions units in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 101. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

## **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>
lamp assembly line - group 14 with carbon adsorption unit		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii). If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Group No. 15 (P020)

**Activity Description:** Medium speed horizontal line with Lehr group no.15

#### 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>
lamp assembly line - group 15 with a baghouse for endbrushing	OAC rule 3745-31-05(A)(3) (PTI 01-08180)	<p>Particulate emissions shall not exceed 0.20 pound per hour and 0.9 ton per year.</p> <p>Sulfur dioxide emissions shall not exceed 1.25 pounds per hour and 5.5 tons per year.</p> <p>Nitrogen oxides emissions shall not exceed 1.60 pounds per hour and 7.0 tons per year.</p> <p>Carbon monoxide emissions shall not exceed 1.25 pounds per hour and 5.5 tons per year.</p> <p>Volatile organic compound emissions shall not exceed 3.25 pounds per hour and 14.2 tons per year.</p> <p>Mercury emissions shall not exceed 0.006 pound per hour and 0.026 ton per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p>
	OAC rule 3745-17-11(B)(1) OAC rule 3745-18-06(E)(2)	<p>See A.I.2.c through A.I.2.e below.</p> <p>The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-21-09(U)	See A.I.2.b below.

**2. Additional Terms and Conditions**

**2.a** The materials employed in this emissions unit neither come in contact with flame nor are baked, heat-cured, or heat-polymerized, in the presence of oxygen. Therefore, OAC rule 3745-21-07(G)(1) does not apply to this emissions unit.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

**2.b** Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-09(U)(1)(d) because the emission unit never uses more than 10 gallons per day.

**2.c** The pound(s) per hour emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

**2.d** The permittee shall use water-based coatings at all times this emissions unit is in operation.

"Water-based coatings" shall be defined as a material in which the water content of the volatile fraction is at least 95%, by weight.

**2.e** The permittee shall vent all emissions from the endbrushing operation to a baghouse.

**II. Operational Restrictions**

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

2. The pressure drop across the baghouse shall be maintained within the range of 2-4 inches of water while the emissions unit is in operation.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Central District Office, compliance with the mass emission limitation and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

3. The maximum daily coating usage for this emissions unit shall not exceed 10 gallons.

4. The permittee shall use only waterbased coatings in this emissions unit.

### **III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the cause of the visible emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
3. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.
4. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
5. The permittee shall maintain daily records of the total coating usage in this emissions unit.
6. For each day during which the permittee uses a coating other than a waterbased coating, as defined in A.I.2.d, the permittee shall maintain a record of the type, quantity, and composition of each such non-waterbased coating used in this emissions unit.

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

4. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.
5. The permittee shall submit annual reports which identify any exceedances of the daily coating usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit deviation (excursion) reports that identify each day when a coating other than a waterbased coating was used in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

### **V. Testing Requirements**

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

## **V. Testing Requirements (continued)**

### **1.a Emission Limitations -**

Particulate emissions shall not exceed 0.20 pound per hour and 0.9 ton per year.

#### Applicable Compliance Method -

Compliance with the pound per hour and ton per year emission limitations shall be demonstrated by summing the combustion and assembly operation emissions.

The pound per hour combustion emissions may be calculated by multiplying the emission factor for total particulates from natural gas combustion of 1.9 lbs PE/mm<sup>3</sup>cu.ft. (AP-42, 1998) by the maximum dryer throughput of 13,300 cu.ft./hr.

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for particulates;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for particulates: Methods 1 through 5, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

Compliance with the ton per year emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the ton per year emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000 lbs/ton).

## **V. Testing Requirements (continued)**

### **1.b Emission Limitations -**

Sulfur dioxide emissions shall not exceed 1.25 pounds per hour and 5.5 tons per year.

#### Applicable Compliance Method -

Compliance with the pounds per hour and tons per year emission limitations shall be demonstrated by summing the combustion and assembly operation emissions.

The pound(s) per hour combustion emissions may be calculated by multiplying the emission factor for natural gas combustion of 0.6 lb SO<sub>2</sub>/mmcu.ft. (AP-42, 1998) by the maximum dryer throughput of 13,300 cu.ft./hr.

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for sulfur dioxide;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for sulfur dioxide: Methods 1 through 4 and 6, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

Compliance with the tons per year emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the tons per year emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000 lbs/ton).

### **1.c Emission Limitations -**

Nitrogen oxides emissions shall not exceed 1.60 pounds per hour and 7.0 tons per year.

#### Applicable Compliance Method -

Compliance with the pounds per hour emission limitation may be demonstrated by multiplying the emission factor for natural gas combustion of 100 lbs NO<sub>x</sub>/mmcu.ft. (AP-42, 1998) by the maximum dryer throughput of 13,300 cu.ft./hr.

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

Compliance with the tons per year emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the tons per year emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000 lbs/ton).

## V. Testing Requirements (continued)

### 1.d Emission Limitations -

Carbon monoxide emissions shall not exceed 1.25 pounds per hour and 5.5 tons per year.

#### Applicable Compliance Method -

Compliance with the pounds per hour emission limitation may be demonstrated by multiplying the emission factor for natural gas combustion of 84 lbs CO/mm<sup>3</sup>cu.ft. (AP-42, 1998) by the maximum dryer throughput of 13,300 cu.ft./hr.

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Compliance with the tons per year emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the tons per year emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000 lbs/ton).

### 1.e Emission Limitations -

Volatile organic compound emissions shall not exceed 3.25 pounds per hour and 14.2 tons per year.

#### Applicable Compliance Method -

Compliance with the pounds per hour and tons per year emission limitations shall be demonstrated by summing the combustion operation and the two assembly operation emissions.

The pound(s) per hour combustion emissions may be calculated by multiplying the emission factor for natural gas combustion of 5.5 lbs VOC/mm<sup>3</sup>cu.ft. (AP-42, 1998) by the maximum dryer throughput of 13,300 cu.ft./hr.

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for volatile organic compounds;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for organic compounds: Methods 1 through 4 and 18, 25 or 25A, as appropriate, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

Compliance with the tons per year emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the tons per year emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000 lbs/ton).

## **V. Testing Requirements (continued)**

### **1.f Emission Limitations -**

Mercury emissions shall not exceed 0.006 pound per hour and 0.026 ton per year.

#### Applicable Compliance Method -

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

- i. the emission testing shall be conducted annually;
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for mercury;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for mercury: Methods 1 through 4 and 101, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

Compliance with the ton per year emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the ton per year emission limitation was calculated by multiplying the hourly emission limitation by 8760, and then dividing by 2000 lbs/ton).

### **1.g Emission Limitation -**

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

#### Applicable Compliance Method -

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
lamp assembly line - group 15 with baghouse		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit P020 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 3.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 548.2

MAGLC (ug/m3): 11,714

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Group No. 12 (P029)

**Activity Description:** Vertical lamp assembly line with lehr group no. 12

#### 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>
lamp assembly line - group 12 with carbon adsorption unit	OAC rule 3745-31-05(A)(3) (PTI 01-3454)	<p>Sulfur dioxide emissions shall not exceed 0.62 pound per hour.</p> <p>Nitrogen oxides emissions shall not exceed 1.00 pound per hour.</p> <p>Carbon monoxide emissions shall not exceed 0.50 pound per hour.</p> <p>Organic compound emissions shall not exceed 0.91 pound per hour.</p> <p>Mercury emissions shall not exceed 0.0015 pound per hour.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p>
	OAC rule 3745-17-11(B)(1) OAC rule 3745-18-06(E)(2)	<p>See A.I.2.c through A.I.2.d below.</p> <p>The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-21-09(U)	See A.I.2.b below.

## 2. Additional Terms and Conditions

- 2.a** The materials employed in this emissions unit neither come in contact with flame nor are baked, heat-cured, or heat-polymerized, in the presence of oxygen. Therefore, OAC rule 3745-21-07(G)(1) does not apply to this emissions unit.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b** Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-09(U)(1)(d) because the emissions unit never uses more than 10 gallons per day.
- 2.c** The permittee shall vent all mercury emissions from this emissions unit to a carbon adsorption unit.
- 2.d** The permittee shall maintain the carbon adsorption system controlling the central vacuum system which serves emissions units P038-group 4, P039-group 7, P040-group 10, P041-group 11, P029-group 12, P019-group 14, P024-group 16, P044-group 17, P004-group 18, P042-group 22, P043-group 24, P025-group 25 and P026-group 26 at a control efficiency of at least 90% for mercury and a mercury emission rate of less than 0.0196 pound per hour at all times.
- 2.e** The pound(s) per hour emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

## II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. The maximum daily coating usage for this emissions unit shall not exceed 10 gallons.
3. The permittee shall use only waterbased coatings in this emissions unit.

"Water-based coatings" shall be defined as a material in which the water content of the volatile fraction is at least 95%, by weight.

## III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain a log identifying the dates when the carbon, used in the carbon adsorber serving this emissions unit, is replaced.
3. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
4. The permittee shall maintain daily records of the total coating usage in this emissions unit.
5. For each day during which the permittee uses a coating other than a waterbased coating, as defined in A.II.3, the permittee shall maintain a record of the type, quantity, and composition of each such non-waterbased coating used in this emissions unit.

## IV. Reporting Requirements

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

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.
3. The permittee shall submit annual reports which identify any exceedances of the daily coating usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit deviation (excursion) reports that identify each day when a coating other than a waterbased coating was used in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **V. Testing Requirements**

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

- 1.a Emission Limitation -  
Sulfur dioxide emissions shall not exceed 0.62 pound per hour.

Applicable Compliance Method -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for natural gas combustion of 0.6 lb SO<sub>2</sub>/mmcu.ft. (AP-42, 1.4, 1998) by the maximum dryer throughput of 5,900 cu.ft./hr.

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for sulfur dioxide;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for sulfur dioxide: Methods 1 through 4 and 6, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

## **V. Testing Requirements (continued)**

**1.b** Emission Limitation -  
Nitrogen oxides emissions shall not exceed 1.00 pound per hour.

Applicable Compliance Method -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for natural gas combustion of 100 lbs NOx/mm<sup>3</sup>.ft. (AP-42, 1.4, 1998) by the maximum dryer throughput of 5,900 cu.ft./hr.

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for nitrogen oxides;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for nitrogen oxides: Methods 1 through 4 and 7, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

**1.c** Emission Limitation -  
Carbon monoxide emissions shall not exceed 0.50 pound per hour.

Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 84 lbs CO/mm<sup>3</sup>.ft. (AP-42, 1.4, 1998) by the maximum dryer throughput of 5,900 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

## V. Testing Requirements (continued)

### 1.d Emission Limitation -

Organic compound emissions shall not exceed 0.91 pound per hour.

#### Applicable Compliance Method -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for natural gas combustion of 11 lbs VOC/mm<sup>3</sup>cu.ft. (AP-42, 1.4 1998) by the maximum dryer throughput of 5,900 cu.ft./hr.

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for organic compounds;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for organic compounds: Methods 1 through 4 and 18, 25 or 25A, as appropriate, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

### 1.e Emission Limitation -

Mercury emissions shall not exceed 0.0015 pound per hour.

#### Applicable Compliance Method -

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

- i. the emission testing shall be conducted annually;
- ii. the emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for mercury;
- iii. the following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for mercury and demonstrate compliance by emission testing as specified in Section A.V.1.g: Methods 1 through 4 and 101, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

### 1.f Emission Limitation -

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

#### Applicable Compliance Method -

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

**V. Testing Requirements (continued)**

**1.g** Emission Limitation -

The carbon adsorption system controlling the central vacuum system which serves emissions units P038-group 4, P039-group 7, P040-group 10, P041-group 11, P029-group 12, P019-group 14, P024-group 16, P044-group 17, P004-group 18, P042-group 22, P043-group 24, P025-group 25 and P026-group 26 shall maintain a control efficiency of at least 90% for mercury and a mercury emission rate of less than 0.0196 pound per hour at all times.

Applicable Compliance Method -

If required, the permittee shall conduct, or have conducted, emission testing for these emissions units in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 101. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

**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>
lamp assembly line - group 12 with carbon adsorption unit		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii). If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Mandrel dissolving (P031)  
**Activity Description:** Coiling operations - coil mandrel dissolving

#### 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>
coil mandrel dissolving with packed bed scrubber	OAC rule 3745-31-05(A)(3) (PTI 01-3133)	Nitrogen oxides emissions shall not exceed 0.41 pound per hour.  Hydrochloric acid (HCl) emissions shall not exceed 0.06 pound per hour.  Nitric acid (HNO <sub>3</sub> ) emissions shall not exceed 0.0005 pound per hour.  Sulfuric acid (H <sub>2</sub> SO <sub>4</sub> ) emissions shall not exceed 0.007 pound per hour.  The requirements of this rule shall also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	See A.I.2.a below. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall vent all emissions from this emissions unit, including all particulate emissions, to a packed bed scrubber with a control efficiency of 99.7% or greater.

## II. Operational Restrictions

1. The permittee shall vent emissions from this emissions unit to the scrubber at all times the emissions unit is in operation.
2. The pH of the scrubber liquor shall be maintained within the range of 6 to 8.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Central District Office, compliance with the mass emission limitation and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

3. The scrubber water flow rate shall be continuously maintained at a value of not less than 5.0 gallons per minute at all times while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pH and record the pH of the scrubber liquor while the emissions unit is in operation. The pH monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The permittee shall record the pH of the scrubber liquor on a daily basis.

The permittee shall maintain a log of the downtime for the scrubber, when the associated emissions unit was in operation.

2. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The scrubber water flow rate, in gallons per minute, on a daily basis.
- b. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

## IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. The pH of the scrubber liquor.
  - b. The scrubber water flow rate.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

## V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation -

Nitrogen oxides emissions shall not exceed 0.41 pound per hour.

Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 100 lbs NOx/mmcu.ft. (AP-42, 1.4, 1998) by the maximum dryer throughput of 400 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

**1.b** Emission Limitation -

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

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

**1.c** Emission Limitation -

HCl emissions shall not exceed 0.06 pound per hour.

Applicable Compliance Method -

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

i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);

ii. inlet and outlet emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for HCl and the 99.7% control efficiency;

iii. the following test methods shall be employed to demonstrate compliance for HCl: Methods 1 through 4 and 26 or 26A, as appropriate, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and

iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

**1.d** Emission Limitation -

HNO<sub>3</sub> emissions shall not exceed 0.0005 pound per hour.

Applicable Compliance Method -

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

i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);

ii. inlet and outlet emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for HNO<sub>3</sub> and the 99.7% control efficiency;

iii. the permittee shall demonstrate compliance for HNO<sub>3</sub> by emission testing in accordance with U.S. EPA - approved test methods; and

iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

## **V. Testing Requirements (continued)**

- 1.e** Emission Limitation -  
H<sub>2</sub>SO<sub>4</sub> emissions shall not exceed 0.007 pound per hour.

Applicable Compliance Method -

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. inlet and outlet emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for H<sub>2</sub>SO<sub>4</sub> and the 99.7% control efficiency;
- iii. the following test methods shall be employed to demonstrate compliance for H<sub>2</sub>SO<sub>4</sub>: Methods 1 through 4 and 8, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

- 1.f** Emission Limitation -  
99.7% control efficiency for PE

Applicable Compliance Method -

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

- i. the emission testing shall be conducted within 3 months after permit issuance (this emissions unit shall be retested at the frequency specified in Ohio EPA Engineering Guide #16);
- ii. inlet and outlet emission testing shall be conducted to demonstrate compliance with the 99.7% control efficiency for PE;
- iii. the following test methods shall be employed to demonstrate compliance for PE: Methods 1 through 5, 40 CFR Part 60, Appendix A (alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA); and
- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity unless otherwise specified or approved by the Ohio EPA, Central District Office.

## **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>
coil mandrel dissolving		

**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**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because 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 cause the emissions of any pollutant that has a listed TLV to increase 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:** Central Lehr 1 (P045)  
**Activity Description:** Central Lehr 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>
central Lehr number 1 with end-brushing operation controlled by a baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 4.61 pounds per hour.
	OAC rule 3745-18-06(E)	Sulfur dioxide emissions shall not exceed 33.71 pounds per hour.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall burn only natural gas in this emissions unit.
- The pressure drop across the baghouse shall be maintained within the range of 2-4 inches of water while the emissions unit is in operation.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Central District Office, compliance with the mass emission limitation and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

##### III. Monitoring and/or Record Keeping Requirements

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

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

2. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

### **V. Testing Requirements**

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

- 1.a Emission Limitation -  
Particulate emissions shall not exceed 4.61 pounds per hour.

Applicable Compliance Method -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The maximum emissions from the process are 0.880 lb PE/hr (GE's 1990 Air Assessment).

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for total particulates from natural gas combustion of 1.9 lbs PE/mm<sup>3</sup>.ft. (AP-42, 1.4, 1998) by the maximum Lehr throughput of 0.0136 mm<sup>3</sup>.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

- 1.b Emission Limitation -  
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

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

## **V. Testing Requirements (continued)**

- 1.c** Emission Limitation -  
Sulfur dioxide emissions shall not exceed 33.71 pounds per hour.

Applicable Compliance Method -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The maximum emissions from the process are 0.697 lb SO<sub>2</sub>/hr (GE's 1990 Air Assessment).

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for natural gas combustion of 0.6 lb SO<sub>2</sub>/mmcu.ft. (AP-42, 1.4, 1998) by the maximum dryer throughput of 0.0136 mmcu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

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

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Central Lehr 2 (P046)  
**Activity Description:** Central Lehr 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>
central Lehr number 2 with end-brushing operation controlled by a baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 7.74 pounds per hour.
	OAC rule 3745-18-06(E)	Sulfur dioxide emissions shall not exceed 56.61 pounds per hour.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall burn only natural gas in this emissions unit.
- The pressure drop across the baghouse shall be maintained within the range of 2-4 inches of water while the emissions unit is in operation.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Central District Office, compliance with the mass emission limitation and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

##### III. Monitoring and/or Record Keeping Requirements

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

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

2. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

### **V. Testing Requirements**

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

- 1.a Emission Limitation -  
Particulate emissions shall not exceed 7.74 pounds per hour.

Applicable Compliance Method -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The maximum emissions from the process are 0.990 lb PE/hr (GE's 1990 Air Assessment).

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for total particulates from natural gas combustion of 1.9 lbs PE/mm<sup>3</sup>.ft. (AP-42, 1.4, 1998) by the maximum Lehr throughput of 0.0313 mm<sup>3</sup>.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

- 1.b Emission Limitation -  
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

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

## **V. Testing Requirements (continued)**

- 1.c** Emission Limitation -  
Sulfur dioxide emissions shall not exceed 56.61 pounds per hour.

Applicable Compliance Method -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The maximum emissions from the process are 0.630 lb SO<sub>2</sub>/hr (GE's 1990 Air Assessment).

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for natural gas combustion of 0.6 lb SO<sub>2</sub>/mmcu.ft. (AP-42, 1.4, 1998) by the maximum dryer throughput of 0.0313 mmcu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

## **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Central Lehr 3 (P047)  
**Activity Description:** Central Lehr 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>
central Lehr number 3 with end-brushing operation controlled by a baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 6.85 pounds per hour.
	OAC rule 3745-18-06(E)	Sulfur dioxide emissions shall not exceed 50.10 pounds per hour.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall burn only natural gas in this emissions unit.
- The pressure drop across the baghouse shall be maintained within the range of 2-4 inches of water while the emissions unit is in operation.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Central District Office, compliance with the mass emission limitation and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

##### III. Monitoring and/or Record Keeping Requirements

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

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

2. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

### **V. Testing Requirements**

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

- 1.a Emission Limitation -  
Particulate emissions shall not exceed 6.85 pounds per hour.

Applicable Compliance Method -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The maximum emissions from the process are 0.880 lb PE/hr (GE's 1990 Air Assessment).

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for total particulates from natural gas combustion of 1.9 lbs PE/mm<sup>3</sup>.ft. (AP-42, 1.4, 1998) by the maximum Lehr throughput of 0.0236 mm<sup>3</sup>.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

- 1.b Emission Limitation -  
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

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

## **V. Testing Requirements (continued)**

- 1.c** Emission Limitation -  
Sulfur dioxide emissions shall not exceed 50.10 pounds per hour.

Applicable Compliance Method -

Compliance shall be demonstrated by summing the emissions from the process and from the combustion of natural gas.

The maximum emissions from the process are 0.630 lb SO<sub>2</sub>/hr (GE's 1990 Air Assessment).

The emissions from the combustion of natural gas may be determined by multiplying the emission factor for natural gas combustion of 0.6 lb SO<sub>2</sub>/mmcu.ft. (AP-42, 1.4, 1998) by the maximum dryer throughput of 0.0236 mmcu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

## **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

**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:** Glass Cullet truck loading system (P901)

**Activity Description:** Glass Cullet truck loading operation

#### 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>
glass cullet truck loading system controlled by a baghouse and carbon adsorption system	OAC rule 3745-31-05(A)(3) (PTI 01-6394)	Particulate emissions shall not exceed 0.02 gr/dscf.
		Particulate emissions shall not exceed 0.37 pound per hour.
		Mercury emissions shall not exceed 0.017 pound per hour.
		Mercury emissions shall not exceed 0.01 ton per year.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	See A.I.2.a and A.I.2.b below. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified in this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ the telescoping chute and partial enclosure at their maximum control capabilities during all times of operation.

## **2. Additional Terms and Conditions (continued)**

- 2.b** Visible particulate emissions of fugitive dust shall not exceed 10% opacity as a 3-minute average.

For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point during unloading operations.

## **II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 10 inches of water while the emissions unit is in operation.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Central District Office, compliance with the mass emission limitation and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

2. The magnahelic gauge on the carbon adsorption system shall be maintained within the range of 1-4 inches of water while the emissions unit is in operation. A value of 1 indicates the maximum pressure achieved by a new filter. A value of greater than 4 indicates that the filter needs to be replaced.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, Central District Office, compliance with the mass emission limitation and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

## **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the cause of the visible emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall perform checks for visible fugitive particulate emissions during unloading operations. If visible fugitive particulate emissions are seen, the permittee shall initiate corrective action to eliminate the source of visible fugitive particulate emissions. If the permittee is unable to eliminate the visible fugitive emissions, the permittee shall cease unloading operations until the repair can be made. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. whether the emissions are representative of normal operations;
  - b. if the emissions are not representative of normal operations, the cause of the abnormal emissions; and
  - c. any corrective actions taken to eliminate the visible emissions.
3. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.

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

4. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the carbon adsorber while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the magnahelic gauge reading on daily basis.

### **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit; (b) describe any corrective actions taken to eliminate the visible particulate emissions; (c) identify all days during which any visible fugitive particulate emissions were observed during unloading operations from this emissions unit and (d) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above; and
  - b. all periods of time during which the magnahelic gauge on the carbon unit did not comply with the allowable range specified above.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

3. The permittee shall submit semiannual written reports that include a log of the downtime for the baghouse and carbon absorption system when this emissions unit was in operation. These reports shall be submitted to the Ohio EPA, Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

### **V. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation -  
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

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

## **V. Testing Requirements (continued)**

### **1.b Emission Limitation -**

Particulate emissions shall not exceed 0.02 gr/dscf.

#### Applicable Compliance Method -

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

- i. The emission testing shall be conducted within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable particulate mass emission rate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable particulate emission rate: 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

### **1.c Emission Limitation -**

Particulate emissions shall not exceed 0.37 pound per hour.

#### Applicable Compliance Method -

Compliance shall be demonstrated based on the emission testing specified in Section A.V.1.b.

### **1.d Emission Limitation -**

Mercury emissions shall not exceed 0.017 pound per hour.

#### Applicable Compliance Method -

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

- i. The emission testing shall be conducted within 6 months of permit issuance and within 6 months of permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mercury mass emission rate.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mercury mass emission rate: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 101. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

### **1.e Emission Limitation -**

Mercury emissions shall not exceed 0.01 ton per year.

#### Applicable Compliance Method -

Compliance shall be demonstrated by multiplying the results of the emission testing required in Section A.V.1.d above by the maximum hours of operation of 1095 hours per year (PTI application 01-6394 submitted 4/96) and dividing by 2000 pounds per ton.

## **V. Testing Requirements (continued)**

- 1.f** Emission Limitation -  
Visible particulate emissions of fugitive dust shall not exceed 10% opacity as a 3-minute average.

Applicable Compliance Method -

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

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

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

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

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

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Downflush coater #6 (R001)

**Activity Description:** Downflush coater # 6 with drying oven; 7.7 mmBtu/hr; non-insignificant only for ammonia

#### 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>
downflush coater #6 with 7.7 mmBtu/hr drying oven	OAC rule 3745-31-05(A)(3) (PTI 01-2717)	Nitrogen oxides emissions shall not exceed 0.78 pound per hour.
		Carbon monoxide emissions shall not exceed 0.65 pound per hour.
		Volatile organic compound emissions shall not exceed 1.07 pounds per hour.
		Ammonia emissions shall not exceed 1.80 pounds per hour.
		The requirements of this rule also include compliance with OAC rules 3745-17-07(A) and 3745-17-11.
		See A.I.2.b through A.I.2.d and A.II.1 below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-18-06(E)(2)	The emission limitation specified by this rule is less stringent than the restriction in PTI 01-2717 that requires that only natural gas be burned in the drying oven.
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(1)	Because the process weight rate is zero, there are no applicable emission limitations from these rules.

## 2. Additional Terms and Conditions

- 2.a** The materials employed in this emissions unit neither come in contact with flame nor are baked, heat-cured, or heat-polymerized, in the presence of oxygen. Therefore, OAC rule 3745-21-07(G)(1) does not apply to this emissions unit.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b** The permittee shall maintain tight fitting covers on the coating mixing tanks except that no hose opening shall have a diameter more than 1.5 inches greater than the outside diameter of the hose to be situated in the opening.
- 2.c** The permittee shall use water-based coatings at all times this emissions unit is in operation.
- 2.d** The pound(s) per hour emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

## II. Operational Restrictions

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

## III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
- 1.a** Emission Limitation -  
Nitrogen oxides emissions shall not exceed 0.78 pound per hour.

Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 100 lbs NOx/mmcf. (AP-42, 1998) by the maximum dryer throughput of 7789 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

## **V. Testing Requirements (continued)**

### **1.b Emission Limitation -**

Carbon monoxide emissions shall not exceed 0.65 pound per hour.

#### Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 84 lbs CO/mm<sup>3</sup>.ft. (AP-42, 1998) by maximum dryer throughput of 7789 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

### **1.c Emission Limitation -**

Volatile organic compound emissions shall not exceed 1.07 pounds per hour.

#### Applicable Compliance Method -

Compliance shall be demonstrated by summing the maximum VOC emissions from natural gas combustion and the coating operation.

The VOC emissions from natural gas combustion may be determined by multiplying the emission factor for natural gas combustion of 11 lbs VOC/mm<sup>3</sup>.ft. (AP-42, 1998) by maximum dryer throughput of 7789 cu.ft./hr.

The VOC emissions from the coating operation may be determined by multiplying the maximum usage of the primary coating (16 gals/hr) by the primary coating's maximum VOC content of 0.06 lb VOC/gal. Then multiplying the maximum usage of the secondary coating (0.003 gal/hr) by the secondary coating's maximum VOC content of 5.78 lbs/gal and summing the two emission rates (PTI application 01-2717, submitted 8/90).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate.

Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the volatile organic compound contents of the coatings. The Director may require that USEPA Method 24 be used to determine the volatile organic compound contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### **1.d Emission Limitation -**

Ammonia emissions shall not exceed 1.80 pounds per hour.

#### Applicable Compliance Method -

Compliance may be determined by multiplying the maximum usage of the ammonia containing coating (16 gals/hr) by the ammonia content (0.11 lb/gal) (PTI 01-2717 application, submitted 8/90).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 206.

## **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>
downflush coater #6 with 7.7 mmBtu/hr drying oven		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii). If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Downflush coater #10 (R002)  
**Activity Description:** Downflush coater # 10 with drying oven; 11.1 mmBtu/hr

#### 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>
downflush coater #10 with 11.1 mmBtu/hr drying oven	OAC rule 3745-31-05(A)(3) (PTI 01-2717)	Nitrogen oxides emissions shall not exceed 1.19 pounds per hour.
		Carbon monoxide emissions shall not exceed 1.0 pound per hour.
		Volatile organic compound emissions shall not exceed 1.70 pounds per hour.
		Ammonia emissions shall not exceed 2.80 pounds per hour.
		The requirements of this rule also include compliance with OAC rules 3745-17-07(A) and 3745-17-11.
		See A.I.2.b through A.I.2.d and A.II.1 below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the restriction in PTI 01-2717 that requires that only natural gas be burned in the drying oven.
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(1)	Because the process weight rate is zero, there are no applicable emission limitations from these rules.

## **2. Additional Terms and Conditions**

- 2.a** The materials employed in this emissions unit neither come in contact with flame nor are baked, heat-cured, or heat-polymerized, in the presence of oxygen. Therefore, OAC rule 3745-21-07(G)(1) does not apply to this emissions unit.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b** The permittee shall maintain tight fitting covers on the coating mixing tanks except that no hose opening shall have a diameter more than 1.5 inches greater than the outside diameter of the hose to be situated in the opening.
- 2.c** The permittee shall use water-based coatings at all times this emissions unit is in operation.
- 2.d** The pound(s) per hour emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

## **II. Operational Restrictions**

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

## **III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
- 1.a** Emission Limitation -  
Nitrogen oxides emissions shall not exceed 1.19 pounds per hour.

Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 100 lbs NOx/mmcf. (AP-42, 1998) by the maximum dryer throughput of 11,853 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

## **V. Testing Requirements (continued)**

### **1.b Emission Limitation -**

Carbon monoxide emissions shall not exceed 1.0 pound per hour.

#### Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 84 lbs CO/mmcf.ft. (AP-42, 1998) by maximum dryer throughput of 11,853 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

### **1.c Emission Limitation -**

Volatile organic compound emissions shall not exceed 1.70 pounds per hour.

#### Applicable Compliance Method -

Compliance shall be demonstrated by summing the maximum VOC emissions from natural gas combustion and the coating operation.

The VOC emissions from natural gas combustion may be determined by multiplying the emission factor for natural gas combustion of 11 lbs VOC/mmcf.ft. (AP-42, 1998) by maximum dryer throughput of 11,853 cu.ft./hr.

The VOC emissions from the coating operation may be determined by multiplying the maximum usage of the primary coating (25 gals/hr) by the primary coating's maximum VOC content of 0.06 lb VOC/gal. Then multiplying the maximum usage of the secondary coating (0.003 gal/hr) by the secondary coating's maximum VOC content of 5.78 lbs/gal and summing the two emission rates (PTI application 01-2717, submitted 8/90).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate.

Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the volatile organic compound contents of the coatings. The Director may require that USEPA Method 24 be used to determine the volatile organic compound contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### **1.d Emission Limitation -**

Ammonia emissions shall not exceed 2.80 pounds per hour.

#### Applicable Compliance Method -

Compliance may be determined by multiplying the maximum usage of the ammonia containing coating (25 gals/hr) by the ammonia content (0.11 lb/gal) (PTI 01-2717 application, submitted 8/90).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 206.

### **1.e Emission Limitation -**

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

#### Applicable Compliance Method -

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

## **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>
downflush coater #10 with 11.1 mmBtu/hr drying oven		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii). If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Downflush coater #12 (R003)

**Activity Description:** Downflush coater # 12 with drying oven; 6.0 mmBtu/hr; non-insignificant only for ammonia

#### 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>
downflush coater #12 with 6.0 mmBtu/hr drying oven	OAC rule 3745-31-05(A)(3) (PTI 01-3584)	Nitrogen oxides emissions shall not exceed 0.6 pound per hour.
		Carbon monoxide emissions shall not exceed 0.5 pound per hour.
		Volatile organic compound emissions shall not exceed 0.77 pound per hour.
		Ammonia emissions shall not exceed 2.0 pounds per hour.
		The requirements of this rule also include compliance with OAC rules 3745-17-07(A) and 3745-17-11.
		See A.I.2.b through A.I.2.d and A.II.1 below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the restriction in PTI 01-2717 that requires that only natural gas be burned in the drying oven.
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(1)	Because the process weight rate is zero, there are no applicable emission limitations from these rules.

## **2. Additional Terms and Conditions**

- 2.a** The materials employed in this emissions unit neither come in contact with flame nor are baked, heat-cured, or heat-polymerized, in the presence of oxygen. Therefore, OAC rule 3745-21-07(G)(1) does not apply to this emissions unit.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b** The permittee shall maintain tight fitting covers on the coating mixing tanks except that no hose opening shall have a diameter more than 1.5 inches greater than the outside diameter of the hose to be situated in the opening.
- 2.c** The permittee shall use water-based coatings at all times this emissions unit is in operation.
- 2.d** The pound(s) per hour emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

## **II. Operational Restrictions**

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

## **III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
- 1.a** Emission Limitation -  
Nitrogen oxides emissions shall not exceed 0.6 pound per hour.

Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 100 lbs NOx/mmcf. (AP-42, 1998) by the maximum dryer throughput of 5,714 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

## **V. Testing Requirements (continued)**

### **1.b Emission Limitation -**

Carbon monoxide emissions shall not exceed 0.5 pound per hour.

#### Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 84 lbs CO/mmcf.ft. (AP-42, 1998) by maximum dryer throughput of 5,714 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

### **1.c Emission Limitation -**

Volatile organic compound emissions shall not exceed 0.77 pound per hour.

#### Applicable Compliance Method -

Compliance shall be demonstrated by summing the maximum VOC emissions from natural gas combustion and the coating operation.

The VOC emissions from natural gas combustion may be determined by multiplying the emission factor for natural gas combustion of 5.5 lbs VOC/mmcf.ft. (AP-42, 1998) by maximum dryer throughput of 5,714 cu.ft./hr.

The VOC emissions from the coating operation may be determined by multiplying the maximum usage of the primary coating (12 gals/hr) by the primary coating's maximum VOC content of 0.06 lb VOC/gal. Then multiplying the maximum usage of the secondary coating (0.003 gal/hr) by the secondary coating's maximum VOC content of 5.78 lbs/gal and summing the two emission rates (PTI application 01-2717, submitted 8/90).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate.

Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the volatile organic compound contents of the coatings. The Director may require that USEPA Method 24 be used to determine the volatile organic compound contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### **1.d Emission Limitation -**

Ammonia emissions shall not exceed 2.0 pounds per hour.

#### Applicable Compliance Method -

Compliance may be determined by multiplying the maximum usage of the ammonia containing coating (12 gals/hr) by the ammonia content (0.11 lb/gal) (PTI 01-2717 application, submitted 8/90).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 206.

### **1.e Emission Limitation -**

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

#### Applicable Compliance Method -

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

## **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>
downflush coater #12 with 6.0 mmBtu/hr drying oven		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii). If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Downflush coater #8 (R005)  
**Activity Description:** Downflush coater # 8 with drying oven; 6.9 mmBtu/hr

#### 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>
downflush coater #8 with 6.9 mmBtu/hr drying oven	OAC rule 3745-31-05(A)(3) (PTI 01-2988)	Nitrogen oxides emissions shall not exceed 0.66 pound per hour.
		Carbon monoxide emissions shall not exceed 0.55 pound per hour.
		Volatile organic compound emissions shall not exceed 1.60 pounds per hour.
		Ammonia emissions shall not exceed 2.70 pounds per hour.
		The requirements of this rule also include compliance with OAC rules 3745-17-07(A) and 3745-17-11.
		See A.I.2.b through A.I.2.d and A.II.1 below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the restriction in PTI 01-2717 that requires that only natural gas be burned in the drying oven.
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(1)	Because the process weight rate is zero, there are no applicable emission limitations from these rules.

## 2. Additional Terms and Conditions

- 2.a** The materials employed in this emissions unit neither come in contact with flame nor are baked, heat-cured, or heat-polymerized, in the presence of oxygen. Therefore, OAC rule 3745-21-07(G)(1) does not apply to this emissions unit.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b** The permittee shall maintain tight fitting covers on the coating mixing tanks except that no hose opening shall have a diameter more than 1.5 inches greater than the outside diameter of the hose to be situated in the opening.
- 2.c** The permittee shall use water-based coatings at all times this emissions unit is in operation.
- 2.d** The pound(s) per hour emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

## II. Operational Restrictions

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

## III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
- 1.a** Emission Limitation -  
Nitrogen oxides emissions shall not exceed 0.66 pound per hour.

Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 100 lbs NOx/mmcf. (AP-42, 1998) by the maximum dryer throughput of 6,593 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

## V. Testing Requirements (continued)

### 1.b Emission Limitation -

Carbon monoxide emissions shall not exceed 0.55 pound per hour.

#### Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 84 lbs CO/mmcf.ft. (AP-42, 1998) by maximum dryer throughput of 6,593 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

### 1.c Emission Limitation -

Volatile organic compound emissions shall not exceed 1.60 pounds per hour.

#### Applicable Compliance Method -

Compliance shall be demonstrated by summing the maximum VOC emissions from natural gas combustion and the coating operation.

The VOC emissions from natural gas combustion may be determined by multiplying the emission factor for natural gas combustion of 11 lbs VOC/mmcf.ft. (AP-42, 1998) by the maximum dryer throughput of 6,593 cu.ft./hr.

The VOC emissions from the coating operation may be determined by multiplying the maximum usage of the primary coating (24.4 gals/hr) by the primary coating's maximum VOC content of 0.06 lb VOC/gal. Then multiplying the maximum usage of the secondary coating (0.0026 gal/hr) by the secondary coating's maximum VOC content of 5.78 lbs/gal and summing the two emission rates (PTI application 01-2988, submitted 2/91).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate.

Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the volatile organic compound contents of the coatings. The Director may require that USEPA Method 24 be used to determine the volatile organic compound contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### 1.d Emission Limitation -

Ammonia emissions shall not exceed 2.70 pounds per hour.

#### Applicable Compliance Method -

Compliance may be determined by multiplying the maximum usage of the ammonia containing coating (24.4 gals/hr) by the ammonia content (0.11 lb/gal) (PTI 01-2988 application, submitted 2/91).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 206.

### 1.e Emission Limitation -

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

#### Applicable Compliance Method -

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

## 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>
downflush coater #8 with 6.9 mmBtu/hr drying oven		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii). If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Downflush coater #11 (R006)

**Activity Description:** Downflush coater # 11 with drying oven; 8.2 mmBtu/hr

#### 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>
downflush coater #11 with 8.2 mmBtu/hr drying oven	OAC rule 3745-31-05(A)(3) (PTI 01-2988)	Nitrogen oxides emissions shall not exceed 0.78 pound per hour.
		Carbon monoxide emissions shall not exceed 0.66 pound per hour.
		Volatile organic compound emissions shall not exceed 1.5 pounds per hour.
		Ammonia emissions shall not exceed 2.40 pounds per hour.
		The requirements of this rule also include compliance with OAC rules 3745-17-07(A) and 3745-17-11.
		See A.I.2.b through A.I.2.d and A.II.1 below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the restriction in PTI 01-2717 that requires that only natural gas be burned in the drying oven.
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(1)	Because the process weight rate is zero, there are no applicable emission limitations from these rules.

## **2. Additional Terms and Conditions**

- 2.a** The materials employed in this emissions unit neither come in contact with flame nor are baked, heat-cured, or heat-polymerized, in the presence of oxygen. Therefore, OAC rule 3745-21-07(G)(1) does not apply to this emissions unit.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b** The permittee shall maintain tight fitting covers on the coating mixing tanks except that no hose opening shall have a diameter more than 1.5 inches greater than the outside diameter of the hose to be situated in the opening.
- 2.c** The permittee shall use water-based coatings at all times this emissions unit is in operation.
- 2.d** The pound(s) per hour emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

## **II. Operational Restrictions**

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

## **III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
- 1.a** Emission Limitation -  
Nitrogen oxides emissions shall not exceed 0.78 pound per hour.

Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 100 lbs NOx/mmcf. (AP-42, 1998) by the maximum dryer throughput of 7,826 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

## V. Testing Requirements (continued)

### 1.b Emission Limitation -

Carbon monoxide emissions shall not exceed 0.66 pound per hour.

#### Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 84 lbs CO/mmcf.ft. (AP-42, 1998) by maximum dryer throughput of 7,826 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

### 1.c Emission Limitation -

Volatile organic compound emissions shall not exceed 1.5 pounds per hour.

#### Applicable Compliance Method -

Compliance shall be demonstrated by summing the maximum VOC emissions from natural gas combustion and the coating operation.

The VOC emissions from natural gas combustion may be determined by multiplying the emission factor for natural gas combustion of 11 lbs VOC/mmcf.ft. (AP-42, 1998) by the maximum dryer throughput of 7,826 cu.ft./hr.

The VOC emissions from the coating operation may be determined by multiplying the maximum usage of the primary coating (22.2 gals/hr) by the primary coating's maximum VOC content of 0.06 lb VOC/gal. Then multiplying the maximum usage of the secondary coating (0.0025 gal/hr) by the secondary coating's maximum VOC content of 5.78 lbs/gal and summing the two emission rates (PTI application 01-2988, submitted 2/91).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate.

Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the volatile organic compound contents of the coatings. The Director may require that USEPA Method 24 be used to determine the volatile organic compound contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### 1.d Emission Limitation -

Ammonia emissions shall not exceed 2.7 pounds per hour.

#### Applicable Compliance Method -

Compliance may be determined by multiplying the maximum usage of the ammonia containing coating (22.2 gals/hr) by the ammonia content (0.11 lb/gal) (PTI 01-2988 application, submitted 2/91).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 206.

### 1.e Emission Limitation -

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

#### Applicable Compliance Method -

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

## 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>
downflush coater #11 with 8.2 mmBtu/hr drying oven		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii). If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Downflush coater #15 (R007)

**Activity Description:** Downflush coater # 15 with drying oven; 10.4 mmBtu/hr

#### 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>
downflush coater #15 with 10.4 mmBtu/hr drying oven	OAC rule 3745-31-05(A)(3) (PTI 01-4306)	Nitrogen oxides emissions shall not exceed 1.46 pounds per hour.
		Carbon monoxide emissions shall not exceed 0.83 pound per hour.
		Volatile organic compound emissions shall not exceed 1.5 pounds per hour.
		Ammonia emissions shall not exceed 2.50 pounds per hour.
		The requirements of this rule also include compliance with OAC rules 3745-17-07(A) and 3745-17-11.
		See A.I.2.b through A.I.2.d and A.II.1 below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the restriction in PTI 01-2717 that requires that only natural gas be burned in the drying oven.
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(1)	Because the process weight rate is zero, there are no applicable emission limitations from these rules.

## **2. Additional Terms and Conditions**

- 2.a** The materials employed in this emissions unit neither come in contact with flame nor are baked, heat-cured, or heat-polymerized, in the presence of oxygen. Therefore, OAC rule 3745-21-07(G)(1) does not apply to this emissions unit.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b** The permittee shall maintain tight fitting covers on the coating mixing tanks except that no hose opening shall have a diameter more than 1.5 inches greater than the outside diameter of the hose to be situated in the opening.
- 2.c** The permittee shall use water-based coatings at all times this emissions unit is in operation.
- 2.d** The pound(s) per hour emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

## **II. Operational Restrictions**

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

## **III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
- 1.a** Emission Limitation -  
Nitrogen oxides emissions shall not exceed 1.46 pounds per hour.

Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 100 lbs NOx/mmcf. (AP-42, 1998) by the maximum dryer throughput of 9,905 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

## **V. Testing Requirements (continued)**

### **1.b Emission Limitation -**

Carbon monoxide emissions shall not exceed 0.83 pound per hour.

#### Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 84 lbs CO/mmcf.ft. (AP-42, 1998) by maximum dryer throughput of 9,905 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

### **1.c Emission Limitation -**

Volatile organic compound emissions shall not exceed 1.5 pounds per hour.

#### Applicable Compliance Method -

Compliance shall be demonstrated by summing the maximum VOC emissions from natural gas combustion and the coating operation.

The VOC emissions from natural gas combustion may be determined by multiplying the emission factor for natural gas combustion of 11 lbs VOC/mmcf.ft. (AP-42, 1998) by the maximum dryer throughput of 9,905 cu.ft./hr.

The VOC emissions from the coating operation may be determined by multiplying the maximum usage of the primary coating (117.4 gals/hr) by the primary coating's maximum VOC content of 0.45 lb VOC/gal. Then multiplying the maximum usage of the secondary coating (0.044 gal/hr) by the secondary coating's maximum VOC content of 3.94 lbs/gal and summing the two emission rates (PTI application 01-2988, submitted 2/91).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate.

Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the volatile organic compound contents of the coatings. The Director may require that USEPA Method 24 be used to determine the volatile organic compound contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### **1.d Emission Limitation -**

Ammonia emissions shall not exceed 2.50 pounds per hour.

#### Applicable Compliance Method -

Compliance may be determined by multiplying the maximum usage of the ammonia containing coating (117.4 gals/hr) by the ammonia content (3.94 lbs/gal) (PTI 01-2988 application, submitted 2/91).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 206.

### **1.e Emission Limitation -**

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

#### Applicable Compliance Method -

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

## **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>
downflush coater #15 with 10.4 mmBtu/hr drying oven		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii). If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Upflush room Coater (R010)

**Activity Description:** Nitro coating - upflush room coater # 6 OEPA ID R010

#### 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>
upflush room coater #6 - Nitro coating	OAC rule 3745-31-05(A)(3) (PTI 01-2780)	See A.I.2.b below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-31-05(D) (PTI 01-2780)	See A.I.2.c through A.I.2.f and A.II.1 and A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b The organic compound (OC) content of each coating, excluding water and exempt solvents, employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.06 pounds per gallon.
- 2.c The OC content of each cleanup material employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.8 pounds per gallon.
- 2.d The combined OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014 shall not exceed 36.24 tons per rolling, 12-month period.
- 2.e The total combined OC emission rate from any two coaters (R010, R011, R012, R013, and R014 combined) shall not exceed 30.3 pounds per hour.

The pounds per hour emission limitation reflects the potential to emit for these emissions units based upon the maximum hourly coating throughputs for any two coaters combined using the coating with the highest OC content. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with this emission limitation.

- 2.f OC emissions from emissions units R010, R011, R012, R013, and R014, combined shall not exceed 3.02 tons per month. OC emissions from cleanup materials shall be included in determining compliance with the monthly OC emission limitation.

## **II. Operational Restrictions**

1. The total monthly coating usage in emissions units R010, R011, R012, R013, and R014 shall not exceed 920.0 gallons.
2. The total monthly usage of cleanup material in emissions units R010, R011, R012, R013, and R014 shall not exceed 69.0 gallons.
3. The permittee shall not operate more than two upflush room coaters (R010, R011, R012, R013, or R014) at any time.

## **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for emissions units R010, R011, R012, R013, and R014:
  - a. the actual coating time for each emissions unit;
  - b. the duration of time during which more than two emissions units (R010, R011, R012, R013, or R014) operate at one time, in hours;
  - c. the name and identification of each coating and cleanup material as applied;
  - d. the OC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied;
  - e. the OC content of each cleanup material, in pounds per gallon, as applied; and
  - f. the number of gallons of each coating, excluding water and exempt solvents, and each cleanup material as applied.
2. The permittee shall collect and record the following information each month for emissions units R010, R011, R012, R013, and R014 combined:
  - a. the total number of gallons of coating, excluding water and exempt solvents, as applied;
  - b. the total number of gallons of cleanup materials, as applied;
  - c. the total OC emissions from coating and cleanup operations, in tons; and
  - d. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials, in tons.
3. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which more than two emissions units (R010, R011, R012, R013, and R014) operated at one time;
  - b. any exceedences of the coating OC content limitation for emissions units R010, R011, R012, R013, and R014;
  - c. any exceedences of the cleanup material OC content limitation for emissions units R010, R011, R012, R013, and R014;
  - d. any exceedences of the monthly OC emission limitation for emissions units R010, R011, R012, R013, and R014;
  - e. any exceedences of the combined rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation -  
The total combined OC emission rate from any two coaters (R010, R011, R012, R013 and R014, combined) shall not exceed 30.3 pounds per hour.  
  
Applicable Compliance Method -  
The hourly emission limitation was developed by multiplying the maximum hourly coating throughput for any two coaters (R010, R011, R012, R013, and R014), of 5.0 gallons per hour by the maximum OC content of 6.06 pounds per gallon (PTI application 01-2780 submitted 7/90).  
  
If required, the permittee shall demonstrate compliance with this emission limitation by emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
  - 1.b Emission Limitation -  
OC emissions from emissions units R010, R011, R012, R013, and R014 shall not exceed 3.02 tons per month.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.2.
  - 1.c Emission Limitation -  
The OC content of each coating, excluding water and exempt solvents, employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.06 pounds per gallon.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.1.
  - 1.d Emission Limitation -  
The OC content of each cleanup material employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.8 pounds per gallon.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.1.

## **V. Testing Requirements (continued)**

**1.e** Emission Limitation -

The combined rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014 shall not exceed 36.24 tons per year.

Applicable Compliance Method -

Compliance shall be based on the record keeping in Section A.III.2.

- 2.** Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the OC contents of the coatings. Formulation data shall be used to determine the OC contents of the cleanup materials. The Director may require that USEPA Method 24 be used to determine the OC contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## **VI. Miscellaneous Requirements**

- 1.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 01-2780, issued on 10/28/92: Section A.III.2.d. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 01-2780, issued on 10/28/92: Section A.IV.1.e. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

**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>
upflush room coater #6 - Nitro coating		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Upflush room Coater (R011)

**Activity Description:** Nitro coating - upflush room coater #10 OEPA ID R011

#### 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>
upflush room coater #10 - Nitro coating	OAC rule 3745-31-05(A)(3) (PTI 01-2780)	See A.I.2.b below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-31-05(D) (PTI 01-2780)	See A.I.2.c through A.I.2.f and A.II.1 and A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b The organic compound (OC) content of each coating, excluding water and exempt solvents, employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.06 pounds per gallon.
- 2.c The OC content of each cleanup material employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.8 pounds per gallon.
- 2.d The combined OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014 shall not exceed 36.24 tons per rolling, 12-month period.
- 2.e The total combined OC emission rate from any two coaters (R010, R011, R012, R013, and R014 combined) shall not exceed 30.3 pounds per hour.

The pounds per hour emission limitation reflects the potential to emit for these emissions units based upon the maximum hourly coating throughputs for any two coaters combined using the coating with the highest OC content. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with this emission limitation.

- 2.f OC emissions from emissions units R010, R011, R012, R013, and R014, combined shall not exceed 3.02 tons per month. OC emissions from cleanup materials shall be included in determining compliance with the monthly OC emission limitation.

## II. Operational Restrictions

1. The total monthly coating usage in emissions units R010, R011, R012, R013, and R014 shall not exceed 920.0 gallons.
2. The total monthly usage of cleanup material in emissions units R010, R011, R012, R013, and R014 shall not exceed 69.0 gallons.
3. The permittee shall not operate more than two upflush room coaters (R010, R011, R012, R013, or R014) at any time.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R010, R011, R012, R013, and R014:
  - a. the actual coating time for each emissions unit;
  - b. the duration of time during which more than two emissions units (R010, R011, R012, R013, or R014) operate at one time, in hours;
  - c. the name and identification of each coating and cleanup material as applied;
  - d. the OC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied;
  - e. the OC content of each cleanup material, in pounds per gallon, as applied; and
  - f. the number of gallons of each coating, excluding water and exempt solvents, and each cleanup material as applied.
2. The permittee shall collect and record the following information each month for emissions units R010, R011, R012, R013, and R014 combined:
  - a. the total number of gallons of coating, excluding water and exempt solvents, as applied;
  - b. the total number of gallons of cleanup materials, as applied;
  - c. the total OC emissions from coating and cleanup operations, in tons; and
  - d. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials, in tons.
3. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which more than two emissions units (R010, R011, R012, R013, and R014) operated at one time;
  - b. any exceedences of the coating OC content limitation for emissions units R010, R011, R012, R013, and R014;
  - c. any exceedences of the cleanup material OC content limitation for emissions units R010, R011, R012, R013, and R014;
  - d. any exceedences of the monthly OC emission limitation for emissions units R010, R011, R012, R013, and R014;
  - e. any exceedences of the combined rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation -  
The total combined OC emission rate from any two coaters (R010, R011, R012, R013 and R014, combined) shall not exceed 30.3 pounds per hour.  
  
Applicable Compliance Method -  
The hourly emission limitation was developed by multiplying the maximum hourly coating throughput for any two coaters (R010, R011, R012, R013, and R014), of 5.0 gallons per hour by the maximum OC content of 6.06 pounds per gallon (PTI application 01-2780 submitted 7/90).  
  
If required, the permittee shall demonstrate compliance with this emission limitation by emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
  - 1.b Emission Limitation -  
OC emissions from emissions units R010, R011, R012, R013, and R014 shall not exceed 3.02 tons per month.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.2.
  - 1.c Emission Limitation -  
The OC content of each coating, excluding water and exempt solvents, employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.06 pounds per gallon.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.1.
  - 1.d Emission Limitation -  
The OC content of each cleanup material employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.8 pounds per gallon.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.1.

## **V. Testing Requirements (continued)**

### **1.e Emission Limitation -**

The combined rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014 shall not exceed 36.24 tons per year.

### **Applicable Compliance Method -**

Compliance shall be based on the record keeping in Section A.III.2.

- 2.** Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the OC contents of the coatings. Formulation data shall be used to determine the OC contents of the cleanup materials. The Director may require that USEPA Method 24 be used to determine the OC contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## **VI. Miscellaneous Requirements**

- 1.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 01-2780, issued on 10/28/92: Section A.III.2.d. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 01-2780, issued on 10/28/92: Section A.IV.1.e. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

**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>
upflush room coater #10 - Nitro coating		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Upflush room Coater (R012)  
**Activity Description:** Nitro coating - upflush room coater #11 OEPA ID R012

#### 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>
upflush room coater #11 - Nitro coating	OAC rule 3745-31-05(A)(3) (PTI 01-2780)	See A.I.2.b below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-31-05(D) (PTI 01-2780)	See A.I.2.c through A.I.2.f and A.II.1 and A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b The organic compound (OC) content of each coating, excluding water and exempt solvents, employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.06 pounds per gallon.
- 2.c The OC content of each cleanup material employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.8 pounds per gallon.
- 2.d The combined OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014 shall not exceed 36.24 tons per rolling, 12-month period.
- 2.e The total combined OC emission rate from any two coaters (R010, R011, R012, R013, and R014 combined) shall not exceed 30.3 pounds per hour.

The pounds per hour emission limitation reflects the potential to emit for these emissions units based upon the maximum hourly coating throughputs for any two coaters combined using the coating with the highest OC content. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with this emission limitation.

- 2.f OC emissions from emissions units R010, R011, R012, R013, and R014, combined shall not exceed 3.02 tons per month. OC emissions from cleanup materials shall be included in determining compliance with the monthly OC emission limitation.

## **II. Operational Restrictions**

1. The total monthly coating usage in emissions units R010, R011, R012, R013, and R014 shall not exceed 920.0 gallons.
2. The total monthly usage of cleanup material in emissions units R010, R011, R012, R013, and R014 shall not exceed 69.0 gallons.
3. The permittee shall not operate more than two upflush room coaters (R010, R011, R012, R013, or R014) at any time.

## **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for emissions units R010, R011, R012, R013, and R014:
  - a. the actual coating time for each emissions unit;
  - b. the duration of time during which more than two emissions units (R010, R011, R012, R013, or R014) operate at one time, in hours;
  - c. the name and identification of each coating and cleanup material as applied;
  - d. the OC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied;
  - e. the OC content of each cleanup material, in pounds per gallon, as applied; and
  - f. the number of gallons of each coating, excluding water and exempt solvents, and each cleanup material as applied.
2. The permittee shall collect and record the following information each month for emissions units R010, R011, R012, R013, and R014 combined:
  - a. the total number of gallons of coating, excluding water and exempt solvents, as applied;
  - b. the total number of gallons of cleanup materials, as applied;
  - c. the total OC emissions from coating and cleanup operations, in tons; and
  - d. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials, in tons.
3. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which more than two emissions units (R010, R011, R012, R013, and R014) operated at one time;
  - b. any exceedences of the coating OC content limitation for emissions units R010, R011, R012, R013, and R014;
  - c. any exceedences of the cleanup material OC content limitation for emissions units R010, R011, R012, R013, and R014;
  - d. any exceedences of the monthly OC emission limitation for emissions units R010, R011, R012, R013, and R014;
  - e. any exceedences of the combined rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation -  
The total combined OC emission rate from any two coaters (R010, R011, R012, R013 and R014, combined) shall not exceed 30.3 pounds per hour.  
  
Applicable Compliance Method -  
The hourly emission limitation was developed by multiplying the maximum hourly coating throughput for any two coaters (R010, R011, R012, R013, and R014), of 5.0 gallons per hour by the maximum OC content of 6.06 pounds per gallon (PTI application 01-2780 submitted 7/90).  
  
If required, the permittee shall demonstrate compliance with this emission limitation by emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
  - 1.b Emission Limitation -  
OC emissions from emissions units R010, R011, R012, R013, and R014 shall not exceed 3.02 tons per month.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.2.
  - 1.c Emission Limitation -  
The OC content of each coating, excluding water and exempt solvents, employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.06 pounds per gallon.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.1.
  - 1.d Emission Limitation -  
The OC content of each cleanup material employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.8 pounds per gallon.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.1.

## **V. Testing Requirements (continued)**

### **1.e Emission Limitation -**

The combined rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014 shall not exceed 36.24 tons per year.

### **Applicable Compliance Method -**

Compliance shall be based on the record keeping in Section A.III.2.

- 2.** Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the OC contents of the coatings. Formulation data shall be used to determine the OC contents of the cleanup materials. The Director may require that USEPA Method 24 be used to determine the OC contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## **VI. Miscellaneous Requirements**

- 1.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 01-2780, issued on 10/28/92: Section A.III.2.d. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 01-2780, issued on 10/28/92: Section A.IV.1.e. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

**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>
upflush room coater #11 - Nitro coating		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Upflush room Coater (R013)

**Activity Description:** Nitro coating - upflush room coater #12 OEPA ID R013

#### 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>
upflush room coater #12 - Nitro coating	OAC rule 3745-31-05(A)(3) (PTI 01-2780)	See A.I.2.b below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-31-05(D) (PTI 01-2780)	See A.I.2.c through A.I.2.f and A.II.1 and A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b The organic compound (OC) content of each coating, excluding water and exempt solvents, employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.06 pounds per gallon.
- 2.c The OC content of each cleanup material employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.8 pounds per gallon.
- 2.d The combined OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014 shall not exceed 36.24 tons per rolling, 12-month period.
- 2.e The total combined OC emission rate from any two coaters (R010, R011, R012, R013, and R014 combined) shall not exceed 30.3 pounds per hour.

The pounds per hour emission limitation reflects the potential to emit for these emissions units based upon the maximum hourly coating throughputs for any two coaters combined using the coating with the highest OC content. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with this emission limitation.

- 2.f OC emissions from emissions units R010, R011, R012, R013, and R014, combined shall not exceed 3.02 tons per month. OC emissions from cleanup materials shall be included in determining compliance with the monthly OC emission limitation.

## II. Operational Restrictions

1. The total monthly coating usage in emissions units R010, R011, R012, R013, and R014 shall not exceed 920.0 gallons.
2. The total monthly usage of cleanup material in emissions units R010, R011, R012, R013, and R014 shall not exceed 69.0 gallons.
3. The permittee shall not operate more than two upflush room coaters (R010, R011, R012, R013, or R014) at any time.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for emissions units R010, R011, R012, R013, and R014:
  - a. the actual coating time for each emissions unit;
  - b. the duration of time during which more than two emissions units (R010, R011, R012, R013, or R014) operate at one time, in hours;
  - c. the name and identification of each coating and cleanup material as applied;
  - d. the OC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied;
  - e. the OC content of each cleanup material, in pounds per gallon, as applied; and
  - f. the number of gallons of each coating, excluding water and exempt solvents, and each cleanup material as applied.
2. The permittee shall collect and record the following information each month for emissions units R010, R011, R012, R013, and R014 combined:
  - a. the total number of gallons of coating, excluding water and exempt solvents, as applied;
  - b. the total number of gallons of cleanup materials, as applied;
  - c. the total OC emissions from coating and cleanup operations, in tons; and
  - d. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials, in tons.
3. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which more than two emissions units (R010, R011, R012, R013, and R014) operated at one time;
  - b. any exceedences of the coating OC content limitation for emissions units R010, R011, R012, R013, and R014;
  - c. any exceedences of the cleanup material OC content limitation for emissions units R010, R011, R012, R013, and R014;
  - d. any exceedences of the monthly OC emission limitation for emissions units R010, R011, R012, R013, and R014;
  - e. any exceedences of the combined rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation -  
The total combined OC emission rate from any two coaters (R010, R011, R012, R013 and R014, combined) shall not exceed 30.3 pounds per hour.  
  
Applicable Compliance Method -  
The hourly emission limitation was developed by multiplying the maximum hourly coating throughput for any two coaters (R010, R011, R012, R013, and R014), of 5.0 gallons per hour by the maximum OC content of 6.06 pounds per gallon (PTI application 01-2780 submitted 7/90).  
  
If required, the permittee shall demonstrate compliance with this emission limitation by emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
  - 1.b Emission Limitation -  
OC emissions from emissions units R010, R011, R012, R013, and R014 shall not exceed 3.02 tons per month.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.2.
  - 1.c Emission Limitation -  
The OC content of each coating, excluding water and exempt solvents, employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.06 pounds per gallon.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.1.
  - 1.d Emission Limitation -  
The OC content of each cleanup material employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.8 pounds per gallon.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.1.

## **V. Testing Requirements (continued)**

### **1.e Emission Limitation -**

The combined rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014 shall not exceed 36.24 tons per year.

### **Applicable Compliance Method -**

Compliance shall be based on the record keeping in Section A.III.2.

- 2.** Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the OC contents of the coatings. Formulation data shall be used to determine the OC contents of the cleanup materials. The Director may require that USEPA Method 24 be used to determine the OC contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## **VI. Miscellaneous Requirements**

- 1.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 01-2780, issued on 10/28/92: Section A.III.2.d. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 01-2780, issued on 10/28/92: Section A.IV.1.e. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

**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>
upflush room coater #12 - Nitro coating		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Upflush room Coater (R014)

**Activity Description:** Nitro coating - upflush room coater #13 OEPA ID R014.

#### 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>
upflush room coater #13 - Nitro coating	OAC rule 3745-31-05(A)(3) (PTI 01-2780)	See A.I.2.b below.
	OAC rule 3745-21-07(G)	See A.I.2.a below.
	OAC rule 3745-31-05(D) (PTI 01-2780)	See A.I.2.c through A.I.2.f and A.II.1 and A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b The organic compound (OC) content of each coating, excluding water and exempt solvents, employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.06 pounds per gallon.
- 2.c The OC content of each cleanup material employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.8 pounds per gallon.
- 2.d The combined OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014 shall not exceed 36.24 tons per rolling, 12-month period.
- 2.e The total combined OC emission rate from any two coaters (R010, R011, R012, R013, and R014 combined) shall not exceed 30.3 pounds per hour.

The pounds per hour emission limitation reflects the potential to emit for these emissions units based upon the maximum hourly coating throughputs for any two coaters combined using the coating with the highest OC content. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with this emission limitation.

- 2.f OC emissions from emissions units R010, R011, R012, R013, and R014, combined shall not exceed 3.02 tons per month. OC emissions from cleanup materials shall be included in determining compliance with the monthly OC emission limitation.

## **II. Operational Restrictions**

1. The total monthly coating usage in emissions units R010, R011, R012, R013, and R014 shall not exceed 920.0 gallons.
2. The total monthly usage of cleanup material in emissions units R010, R011, R012, R013, and R014 shall not exceed 69.0 gallons.
3. The permittee shall not operate more than two upflush room coaters (R010, R011, R012, R013, or R014) at any time.

## **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for emissions units R010, R011, R012, R013, and R014:
  - a. the actual coating time for each emissions unit;
  - b. the duration of time during which more than two emissions units (R010, R011, R012, R013, or R014) operate at one time, in hours;
  - c. the name and identification of each coating and cleanup material as applied;
  - d. the OC content of each coating, in pounds per gallon, excluding water and exempt solvents, as applied;
  - e. the OC content of each cleanup material, in pounds per gallon, as applied; and
  - f. the number of gallons of each coating, excluding water and exempt solvents, and each cleanup material as applied.
2. The permittee shall collect and record the following information each month for emissions units R010, R011, R012, R013, and R014 combined:
  - a. the total number of gallons of coating, excluding water and exempt solvents, as applied;
  - b. the total number of gallons of cleanup materials, as applied;
  - c. the total OC emissions from coating and cleanup operations, in tons; and
  - d. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials, in tons.
3. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which more than two emissions units (R010, R011, R012, R013, and R014) operated at one time;
  - b. any exceedences of the coating OC content limitation for emissions units R010, R011, R012, R013, and R014;
  - c. any exceedences of the cleanup material OC content limitation for emissions units R010, R011, R012, R013, and R014;
  - d. any exceedences of the monthly OC emission limitation for emissions units R010, R011, R012, R013, and R014;
  - e. any exceedences of the combined rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation -  
The total combined OC emission rate from any two coaters (R010, R011, R012, R013 and R014, combined) shall not exceed 30.3 pounds per hour.  
  
Applicable Compliance Method -  
The hourly emission limitation was developed by multiplying the maximum hourly coating throughput for any two coaters (R010, R011, R012, R013, and R014), of 5.0 gallons per hour by the maximum OC content of 6.06 pounds per gallon (PTI application 01-2780 submitted 7/90).  
  
If required, the permittee shall demonstrate compliance with this emission limitation by emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.
  - 1.b Emission Limitation -  
OC emissions from emissions units R010, R011, R012, R013, and R014 shall not exceed 3.02 tons per month.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.2.
  - 1.c Emission Limitation -  
The OC content of each coating, excluding water and exempt solvents, employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.06 pounds per gallon.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.1.
  - 1.d Emission Limitation -  
The OC content of each cleanup material employed in emissions units R010, R011, R012, R013, and R014 shall not exceed 6.8 pounds per gallon.  
  
Applicable Compliance Method -  
Compliance shall be based on the record keeping in Section A.III.1.

## **V. Testing Requirements (continued)**

### **1.e Emission Limitation -**

The combined rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials from emissions units R010, R011, R012, R013, and R014 shall not exceed 36.24 tons per year.

### **Applicable Compliance Method -**

Compliance shall be based on the record keeping in Section A.III.2.

- 2.** Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the OC contents of the coatings. Formulation data shall be used to determine the OC contents of the cleanup materials. The Director may require that USEPA Method 24 be used to determine the OC contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## **VI. Miscellaneous Requirements**

- 1.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 01-2780, issued on 10/28/92: Section A.III.2.d. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- 2.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 01-2780, issued on 10/28/92: Section A.IV.1.e. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

**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>
upflush room coater #13 - Nitro coating		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Downflush coater #16 (R015)

**Activity Description:** Downflush coater # 16 for fluorescent lamp manufacturing with dryer and bulb wash; 10.8 mmBtu/hr

#### 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>
downflush coater #16 with 10.8 mmBtu/hr drying oven	OAC rule 3745-31-05(A)(3) (PTI 01-4603)	<p>Nitrogen oxides emissions shall not exceed 1.03 pounds per hour.</p> <p>Carbon monoxide emissions shall not exceed 0.86 pound per hour.</p> <p>Volatile organic compound emissions shall not exceed 1.41 pounds per hour.</p> <p>Ammonia emissions shall not exceed 2.56 pounds per hour.</p> <p>Monoethanolamine (MEA) emissions shall not exceed 1.40 pounds per hour.</p> <p>The requirements of this rule also include compliance with OAC rules 3745-17-07(A) and 3745-17-11.</p>
	OAC rule 3745-21-07(G)	See A.I.2.b through A.I.2.d and A.II.1 below.
	OAC rule 3745-18-06(E)	See A.I.2.a below.
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(1)	<p>The emission limitation specified by this rule is less stringent than the restriction in PTI 01-2717 that requires that only natural gas be burned in the drying oven.</p> <p>Because the process weight rate is zero, there are no applicable emission limitations from these rules.</p>

## **2. Additional Terms and Conditions**

- 2.a** The materials employed in this emissions unit neither come in contact with flame nor are baked, heat-cured, or heat-polymerized, in the presence of oxygen. Therefore, OAC rule 3745-21-07(G)(1) does not apply to this emissions unit.

To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.b** The permittee shall maintain tight fitting covers on the coating mixing tanks except that no hose opening shall have a diameter more than 1.5 inches greater than the outside diameter of the hose to be situated in the opening.
- 2.c** The permittee shall use water-based coatings at all times this emissions unit is in operation.
- 2.d** The pound(s) per hour emission limitations are based on the emissions unit's potential to emit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to ensure compliance with these emission limitations.

## **II. Operational Restrictions**

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

## **III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
- 1.a** Emission Limitation -  
Nitrogen oxides emissions shall not exceed 1.03 pound per hour.

Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 100 lbs NOx/mmcf. (AP-42, 1998) by the maximum dryer throughput of 10,281 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

## V. Testing Requirements (continued)

### 1.b Emission Limitation -

Carbon monoxide emissions shall not exceed 0.86 pound per hour.

#### Applicable Compliance Method -

Compliance may be demonstrated by multiplying the emission factor for natural gas combustion of 84 lbs CO/mmcf.ft. (AP-42, 1998) by maximum dryer throughput of 10,281 cu.ft./hr.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

### 1.c Emission Limitation -

Volatile organic compound emissions shall not exceed 1.41 pounds per hour.

#### Applicable Compliance Method -

Compliance shall be demonstrated by summing the maximum VOC emissions from natural gas combustion and the coating operation.

The VOC emissions from natural gas combustion may be determined by multiplying the emission factor for natural gas combustion of 11 lbs VOC/mmcf.ft. (AP-42, 1998) by the maximum dryer throughput of 10,281 cu.ft./hr.

The VOC emissions from the coating operation may be determined by multiplying the maximum usage of the primary coating (112.1 gals/hr) by the primary coating's maximum VOC content of 0.449 lb VOC/gal. Then multiplying the maximum usage of the secondary coating (0.044 gal/hr) by the secondary coating's maximum VOC content of 3.94 lbs/gal and summing the two emission rates (PTI application 01-4603, submitted 7/93).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate.

Formulation data or USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the volatile organic compound contents of the coatings. The Director may require that USEPA Method 24 be used to determine the volatile organic compound contents of the coatings. If, pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

### 1.d Emission Limitation -

Ammonia emissions shall not exceed 2.56 pounds per hour.

#### Applicable Compliance Method -

Compliance may be determined by multiplying the maximum usage of the ammonia containing coating (112.1 gals/hr) by the ammonia content (0.825 lbs/gal) (PTI application 01-4603, submitted 7/93).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 206.

### 1.e Emission Limitation -

Monoethanolamine (MEA) emissions shall not exceed 1.40 pounds per hour.

#### Applicable Compliance Method -

Compliance may be determined by multiplying the maximum usage of the MEA containing coating (23.3 gals/hr) by the MEA content (0.06 lbs/gal) (PTI application 01-4603, submitted 7/93).

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18.

Facility Name: **G. E. Lighting, Inc. - Circleville Lamp Plant**

Facility ID: **01-65-01-0026**

Emissions Unit: **Downflush coater #16 (R015)**

## **V. Testing Requirements (continued)**

### **1.f Emission Limitation -**

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

### **Applicable Compliance Method -**

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

## **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>
downflush coater #15 with 10.4 mmBtu/hr drying oven		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. Physical changes to or changes in the method of operation of the emissions unit could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31- 01(VV)(1)(a)(ii). If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

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