



State of Ohio Environmental Protection Agency

Street Address:

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

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Mailing Address:

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

09/23/99

CERTIFIED MAIL

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

16-77-01-0193
Goodyear Tire & Rubber Co.
Dave Chapman
1144 East Market Street
Dept. 110 F
Akron, OH 44316

Dear Dave Chapman:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 12/03/98. The comment period 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 or with agreed-upon changes, then you have the opportunity to schedule a meeting with us to discuss your concerns.

Please contact Jim Orlemann, Engineering Section Manager, 614-644-3592, or you can telefax your request to (614) 644-3681, within fourteen (14) days from receipt of this letter if a meeting is desired. If a request for a meeting is not received within fourteen (14) days of receipt of this letter, we will forward this proposed permit (as written, or with agreed-upon changes) to USEPA for approval.

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive, flowing style.

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

cc: Akron Air Pollution Control
Becky Castle, DAPC PMU



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Date: 09/23/99

PRELIMINARY PROPOSED

Effective Date:

Expiration Date:

This document constitutes issuance to:

Goodyear Tire & Rubber Co.
1144 East Market Street
Akron, OH 44316

of a Title V permit for Facility ID: 16-77-01-0193

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

B101 ("A" Boiler)
Coal fired boiler

B102 ("B" Boiler)
Coal fired boiler

B103 ("C" Boiler)
Coal fired boiler

F104 (Fugitive dust sources)
Crushing/transporting of coal; flyash and bottom ash unloading

R014 (ZZ515B)
Race manual tread end preparation

R106 (ZZ515B)
Race manual undertread tread cementing

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

Akron Air Pollution Control
146 South High Street, Room 904
Akron, OH 44308
(330) 375-2480

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month

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

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

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

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

7. Fees

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

8. Marketable Permit Programs

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

9. Reasonably Anticipated Operating Scenarios

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

10. Reopening for Cause

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

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

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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

13. Permit Shield

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

14. Operational Flexibility

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

15. Emergencies

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

16. Off Permit Changes

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

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

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

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

17. Compliance Method Requirements

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

B. State Only Enforceable Section

1. Permit to Install Requirement

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

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

B007 - emergency generator, Plant 1, chiller room
K101 - maintenace/equipment painting with HP/LP manual spray gun
K102 - maintenace/equipment painting with HP/LP manual spray gun
P006 - mixing of rubber compounds
P007 - mixing of rubber compounds
P010 - mixing of rubber compounds
P041 - grinding of tire carcasses
R103 - bias paint & line booth-waterbase
R104 - radial paint & line booth-waterbase
R112 - R&D retread spray booth with LP manual spray gun
R115 - tire prep/lettering booth
R118 - tire paint & line booth-waterbase
Z003 - table saw, Plant 1, photography
Z004 - water treating plant
Z005 - bead room area
Z006 - fabric calendering operation
Z007 - tire curing room area
Z008 - paint shop paint booth in Plant 1
Z009 - emergency compressor in power house, diesel
Z010 - spray pond used for cooling
Z011 - emergency generator in power house, diesel

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: "A" Boiler (B101)

Activity Description: Coal fired boiler

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>
coal fired boiler - 301 million BTU/hr - controlled with electrostatic precipitator	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-10	0.11 pound of particulate emissions per million Btu actual heat input based on 776 million Btu actual heat input for boilers B101, B102, and B103
	OAC rule 3745-18-83	See A.2.b below.
	40 CFR 52.1881(b)(28)(ix)(E)(1)	4.64 pounds of sulfur dioxide per million Btu actual heat input for coal-fired boilers B101, B102, and B103 exiting through stack 4

2. Additional Terms and Conditions

- 2.a Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, from any stack, except as provided by rule.
- 2.b The sulfur dioxide emission limitation established in accordance with OAC rule 3745-18-83 is less stringent than the sulfur dioxide emission limitation established in accordance with 40 CFR 52.1881(b)(28)(ix)(E)(1).

II. Operational Restrictions

1. The quality of coal burned in this emissions unit shall have a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.64 pounds of sulfur dioxide per million Btu actual heat input.

Compliance with the above specification for sulfur content shall be on an "as-burned" basis and shall be determined by using the 30-day, rolling, weighted average of the analytical results for the daily composite sample of coal.
2. The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of startup until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.

II. Operational Restrictions (continued)

3. The permittee shall operate and maintain the microprocessor-based system that modulates the power of each transformer rectifier set in conjunction with the level of operation of each boiler, and shall ensure that all ESP fields are operational in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record the total quantity of coal burned in this emissions unit on a daily basis.
2. For the purpose of determining ash content, the permittee shall collect representative three-day composite samples of the coal received. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. The results shall be reported as a calculated volume-weighted average at the end of each calendar month. Each three-day composite sample shall be composed of aliquots from each and every truckload of coal that is delivered. Every three-day composite sample shall be analyzed individually, with the results averaged each calendar month.

Each monthly composite sample of coal shall be analyzed for ash content (percent). The analytical method for ash content shall be ASTM method D3174, Ash in the Analysis of Coal and Coke. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

3. For the purpose of determining sulfur and heat content, the permittee shall collect daily composite samples of the coal burned in this emissions unit. The individual samples for each daily composite shall be collected from the coal inlet prior to entering the boiler. A sufficient number of individual samples shall be collected so that each composite sample is representative of the average quality of coal burned in this emissions unit during each calendar day. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal.

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

4. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request. However, it is recognized that this emissions unit was in existence prior to the effective dates of the pertinent New Source Performance Standards under 40 CFR Part 60.

The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13. However, as noted above, the terms of 40 CFR Part 60 do not apply to this source.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (1-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

5. The permittee shall monitor and record the following on an hourly basis during any operation of the ESP: the primary voltage, in kilovolts (kV), and the primary current in amps, for each transformer rectifier (TR) set in the ESP.
6. The permittee shall record, for each day, a log of the downtime for the monitoring equipment specified in section A.III.5 above, the ESP sections that are out of service, and the duration of the downtime(s) for each section when the associated emissions unit was in operation.

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

7. The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP as follows:
 - a. during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
 - b. during all periods of shutdown until the inlet temperature to the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in degrees Fahrenheit.

IV. Reporting Requirements

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

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

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

2. The permittee shall submit deviation (excursion) reports which identify each period during which the sulfur content which was not sufficient to comply with the sulfur dioxide emission limitation (for any 30-day, rolling period).
3. The permittee shall submit deviation (excursion) reports which identify all periods of time during startup and shutdown of the emissions unit when the ESP was not in operation and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i).
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
5. The permittee shall submit quarterly reports which identify the sections of the ESP that were out of service along with the time period(s) involved. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the information obtained during the previous calendar quarter.

V. Testing Requirements

1. Emission Limitation:

0.11 pound of particulate emissions per million BTU actual heat input

4.64 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III, engineering calculations, and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.11 pound of particulate emissions per million Btu actual heat input and 4.64 pounds of sulfur dioxide per million Btu actual heat input emission limitations in accordance with the following requirements:

a. the emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal;

b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulates and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and

c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 Akron RAQMD's refusal to accept the results of the emission test(s).

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

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

3. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures 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>
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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: "B" Boiler (B102)

Activity Description: Coal fired boiler

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>
coal fired boiler - 301 million BTU/hr - controlled with electrostatic precipitator	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-10	0.11 pound of particulate emissions per million Btu actual heat input based on 776 million Btu actual heat input for boilers B101, B102, and B103
	OAC rule 3745-18-83	See A.2.b below.
	40 CFR 52.1881(b)(28)(ix)(E)(1)	4.64 pounds of sulfur dioxide per million Btu actual heat input for coal-fired boilers B101, B102, and B103 exiting through stack 4

2. Additional Terms and Conditions

- 2.a Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, from any stack, except as provided by rule.
- 2.b The sulfur dioxide emission limitation established in accordance with OAC rule 3745-18-83 is less stringent than the sulfur dioxide emission limitation established in accordance with 40 CFR 52.1881(b)(28)(ix)(E)(1).

II. Operational Restrictions

1. The quality of coal burned in this emissions unit shall have a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.64 pounds of sulfur dioxide per million Btu actual heat input.

Compliance with the above specification for sulfur content shall be on an "as-burned" basis and shall be determined by using the 30-day, rolling, weighted average of the analytical results for the daily composite sample of coal.
2. The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of startup until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.

II. Operational Restrictions (continued)

3. The permittee shall operate and maintain the microprocessor-based system that modulates the power of each transformer rectifier set in conjunction with the level of operation of each boiler, and shall ensure that all ESP fields are operational in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record the total quantity of coal burned in this emissions unit on a daily basis.
2. For the purpose of determining ash content, the permittee shall collect representative three-day composite samples of the coal received. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. The results shall be reported as a calculated volume-weighted average at the end of each calendar month. Each three-day composite sample shall be composed of aliquots from each and every truckload of coal that is delivered. Every three-day composite sample shall be analyzed individually, with the results averaged each calendar month.

Each monthly composite sample of coal shall be analyzed for ash content (percent). The analytical method for ash content shall be ASTM method D3174, Ash in the Analysis of Coal and Coke. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

3. For the purpose of determining sulfur and heat content, the permittee shall collect daily composite samples of the coal burned in this emissions unit. The individual samples for each daily composite shall be collected from the coal inlet prior to entering the boiler. A sufficient number of individual samples shall be collected so that each composite sample is representative of the average quality of coal burned in this emissions unit during each calendar day. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal.

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

4. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request. However, it is recognized that this emissions unit was in existence prior to the effective dates of the pertinent New Source Performance Standards under 40 CFR Part 60.

The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13. However, as noted above, the terms of 40 CFR Part 60 do not apply to this source.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (1-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

5. The permittee shall monitor and record the following on an hourly basis during any operation of the ESP: the primary voltage, in kilovolts (kV), and the primary current in amps, for each transformer rectifier (TR) set in the ESP.
6. The permittee shall record, for each day, a log of the downtime for the monitoring equipment specified in section A.III.5 above, the ESP sections that are out of service, and the duration of the downtime(s) for each section when the associated emissions unit was in operation.

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

7. The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP as follows:
 - a. during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
 - b. during all periods of shutdown until the inlet temperature to the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in degrees Fahrenheit.

IV. Reporting Requirements

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

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

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

2. The permittee shall submit deviation (excursion) reports which identify each period during which the sulfur content which was not sufficient to comply with the sulfur dioxide emission limitation (for any 30-day, rolling period).
3. The permittee shall submit deviation (excursion) reports which identify all periods of time during startup and shutdown of the emissions unit when the ESP was not in operation and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i).
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
5. The permittee shall submit quarterly reports which identify the sections of the ESP that were out of service along with the time period(s) involved. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the information obtained during the previous calendar quarter.

V. Testing Requirements

1. Emission Limitation:

0.11 pound of particulate emissions per million BTU actual heat input
4.64 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III, engineering calculations, and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.11 pound of particulate emissions per million Btu actual heat input and 4.64 pounds of sulfur dioxide per million Btu actual heat input emission limitations in accordance with the following requirements:

- a. the emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal;
- b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulates and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and
- c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 Akron RAQMD's refusal to accept the results of the emission test(s).

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

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

3. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures 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>
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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: "C" Boiler (B103)

Activity Description: Coal fired boiler

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>
coal fired boiler - 174 million BTU/hr - controlled with electrostatic precipitator	OAC rule 3745-17-07	See A.2.a below.
	OAC rule 3745-17-10	0.11 pound of particulate emissions per million Btu actual heat input based on 776 million Btu actual heat input for boilers B101, B102, and B103
	OAC rule 3745-18-83	See A.2.b below.
	40 CFR 52.1881(b)(28)(ix)(E)(1)	4.64 pounds of sulfur dioxide per million Btu actual heat input for coal-fired boilers B101, B102, and B103 exiting through stack 4

2. Additional Terms and Conditions

- 2.a Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, from any stack, except as provided by rule.
- 2.b The sulfur dioxide emission limitation established in accordance with OAC rule 3745-18-83 is less stringent than the sulfur dioxide emission limitation established in accordance with 40 CFR 52.1881(b)(28)(ix)(E)(1).

II. Operational Restrictions

1. The quality of coal burned in this emissions unit shall have a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 4.64 pounds of sulfur dioxide per million Btu actual heat input.

Compliance with the above specification for sulfur content shall be on an "as-burned" basis and shall be determined by using the 30-day, rolling, weighted average of the analytical results for the daily composite sample of coal.
2. The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of startup until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.

II. Operational Restrictions (continued)

3. The permittee shall operate and maintain the microprocessor-based system that modulates the power of each transformer rectifier set in conjunction with the level of operation of each boiler, and shall ensure that all ESP fields are operational in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record the total quantity of coal burned in this emissions unit on a daily basis.
2. For the purpose of determining ash content, the permittee shall collect representative three-day composite samples of the coal received. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. The results shall be reported as a calculated volume-weighted average at the end of each calendar month. Each three-day composite sample shall be composed of aliquots from each and every truckload of coal that is delivered. Every three-day composite sample shall be analyzed individually, with the results averaged each calendar month.

Each monthly composite sample of coal shall be analyzed for ash content (percent). The analytical method for ash content shall be ASTM method D3174, Ash in the Analysis of Coal and Coke. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

3. For the purpose of determining sulfur and heat content, the permittee shall collect daily composite samples of the coal burned in this emissions unit. The individual samples for each daily composite shall be collected from the coal inlet prior to entering the boiler. A sufficient number of individual samples shall be collected so that each composite sample is representative of the average quality of coal burned in this emissions unit during each calendar day. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal.

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

4. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request. However, it is recognized that this emissions unit was in existence prior to the effective dates of the pertinent New Source Performance Standards under 40 CFR Part 60.

The permittee shall operate and maintain the existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13. However, as noted above, the terms of 40 CFR Part 60 do not apply to this source.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (1-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

5. The permittee shall monitor and record the following on an hourly basis during any operation of the ESP: the primary voltage, in kilovolts (kV), and the primary current in amps, for each transformer rectifier (TR) set in the ESP.
6. The permittee shall record, for each day, a log of the downtime for the monitoring equipment specified in section A.III.5 above, the ESP sections that are out of service, and the duration of the downtime(s) for each section when the associated emissions unit was in operation.

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

7. The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP as follows:
 - a. during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
 - b. during all periods of shutdown until the inlet temperature to the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in degrees Fahrenheit.

IV. Reporting Requirements

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

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

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

2. The permittee shall submit deviation (excursion) reports which identify each period during which the sulfur content which was not sufficient to comply with the sulfur dioxide emission limitation (for any 30-day, rolling period).
3. The permittee shall submit deviation (excursion) reports which identify all periods of time during startup and shutdown of the emissions unit when the ESP was not in operation and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i).
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
5. The permittee shall submit quarterly reports which identify the sections of the ESP that were out of service along with the time period(s) involved. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the information obtained during the previous calendar quarter.

V. Testing Requirements

1. Emission Limitation:

0.11 pound of particulate emissions per million BTU actual heat input

4.64 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III, engineering calculations, and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulate and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.11 pound of particulate emissions per million Btu actual heat input and 4.64 pounds of sulfur dioxide per million Btu actual heat input emission limitations in accordance with the following requirements:

a. the emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal;

b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulates and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and

c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 Akron RAQMD's refusal to accept the results of the emission test(s).

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

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

3. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitations in OAC rule 3745-17-07(A)(1) shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures 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>
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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: Fugitive dust sources (F104)

Activity Description: Crushing/transporting of coal; flyash and bottom ash unloading

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>
coal unloading from railcars or trucks (see Section A.I.2.a.), coal conveyors (see Section A.I.2.b.), coal handling (see Section A.I.2.c.), and coal transfer points (see Section A.I.2.d.)	OAC rule 3745-17-07(B)(7)(b)	20 percent opacity as a 3-minute average
fly ash and/or bottom ash pneumatic conveying to silos, and fly ash and/or bottom ash silo load-out into trucks and/or railcars	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.e. through A.I.2.f., and A.I.2.j.)
	OAC rule 3745-17-07(B)(7)(b)	20 percent opacity as a 3-minute average
fly ash and/or bottom ash silo vents (each with baghouse)	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.g. through A.I.2.j.)
	OAC rule 3745-17-07(A)(1)	20 percent opacity as a 6-minute average, except for one 6-minute average per hour not to exceed 60 percent opacity as a 6-minute average
	OAC rule 3745-17-11(B)(1)	11.4 lbs/hr of particulate emissions (based upon 4.6 tons per hour maximum process weight rate)

2. Additional Terms and Conditions

- 2.a The coal unloading stations for railcars or trucks that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

truck unloading station

2. Additional Terms and Conditions (continued)

- 2.b** The coal conveyors that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

belt conveyor
bucket elevator

- 2.c** The coal handling operations that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

unloading
transfer
loading
conveying

- 2.d** The coal transfer points that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

truck unloading into pan
enter pusher
enter crusher
enter bucket
enter conveyor
dump into bunker
enter pulverisor
enter boiler

- 2.e** The permittee shall employ reasonably available control measures on all coal unloading stations for trucks, coal conveyors, coal handling operations, and coal transfer points for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the coal unloading stations, coal conveyors, coal handling operations, and coal transfer points with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies or use adequate enclosure to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.f** For each coal unloading station, coal conveyor, coal handling operation, and coal transfer point that is not adequately enclosed, such unloading station, conveyor, handling operation or transfer point shall be treated with water and/or suitable dust suppression chemicals if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during operation of any coal unloading station, coal conveyor, coal handling, or coal transfer point until further observation confirms that use of the control measures is unnecessary.

- 2.g** The permittee shall employ reasonably available control measures on all fly ash and/or bottom ash pneumatic conveying equipment for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintaining total enclosure of such equipment to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.h** The permittee shall employ reasonably available control measures for operations employing the dumping of fly ash and/or bottom ash from storage silos to trucks for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to apply sufficient water to the fly ash and/or bottom ash during any load-out from storage silos to trucks to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

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

6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.
7. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in Section A.III.7.d shall be kept separately for (i) the coal unloading stations, (ii) the coal conveyors, (iii) the coal handling operations, and (iv) the coal transfer points, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

8. The permittee shall perform daily checks, while the equipment is in operation, for any visible emissions of fugitive dust escaping from any fly ash and/or bottom ash pneumatic conveying systems, for any unusual visible emissions from baghouses serving fly ash and/or bottom ash storage silos, and of the effectiveness of the water addition to the fly ash and/or bottom ash during loadout from storage silos into dump trucks to ensure compliance with the above-mentioned applicable requirements during silo loadout. A record of the necessary and completed corrective actions resulting from the daily checks shall be maintained by the permittee.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed at the required frequency; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.I.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations for coal unloading, conveyors, handling operations, and transfer points identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.*
2. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

2.a Emission Limitation:

20% opacity for fly ash and/or bottom ash pneumatic conveying to silos and fly ash and/or bottom ash silo load-out into trucks and/or railcars as a 3-minute average

Applicable Compliance Method:

Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03*

2.b Emission Limitation:

20% opacity for fly ash and/or bottom ash silo vents as a 6-minute average, except for one 6-minute average per hour not to exceed 60 percent opacity as a 6-minute average

Applicable Compliance Method:

Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

2.c Emission Limitation:

11.4 lbs/hr of particulate emissions from fly ash and/or bottom ash silo vents

Applicable Compliance Method:

If required by the appropriate Ohio EPA District Office or local air agency, compliance shall be demonstrated using Test Method 5 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996; otherwise, compliance shall be demonstrated by the absence of any visible emissions from the baghouse serving any silo vents and using Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03*

*The procedures related to Test Methods 9 and 22 reflect the settlement agreement reached between Ohio EPA and the Ohio Electric Utilities concerning the Utilities' appeal to the Ohio Environmental Review Appeals Commission of the 1991 revisions and additions to OAC Chapter 3745-17. The revised rule containing the procedures was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the Ohio Electric Utilities have agreed to consider the procedures as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the procedures as a revision to the Ohio SIP for particulate matter.

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>
coal unloading from barges, railcars, or trucks (see Section A.I.2.a.), coal conveyors (see Section A.I.2.b.), coal handling (see Section A.I.2.c.), and coal transfer points (see Section A.I.2.d.)	none	none
fly ash and/or bottom ash pneumatic conveying to silos, and fly ash and/or bottom ash silo load-out into trucks and/or railcars	none	none
fly ash and/or bottom ash silo vents (each with baghouse)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. If there are no deviations during a calendar quarter that must be reported pursuant to the reporting requirements of this permit, the permittee shall submit a quarterly report, in accordance with paragraph B.8 of the General Terms and Conditions of this permit, which states that no deviations occurred during that quarter.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: ZZ515B (R014)
Activity Description: Race manual tread end preparation

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>
ZZ515B - race manual tread end preparation	OAC rule 3745-21-09(X)	exempt (see A.I.2.a)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the requirements of OAC rule 3745-21-09(X) because the operation produces specialty tires for antique or other vehicles on an irregular basis or with short production runs. The exemption applies only to tires produced on equipment separate from normal production lines for passenger-type tires.

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>
ZZ515B - race manual tread end preparation	OAC rule 3745-31-05 (PTI 16-1854)	36 lbs/day of volatile organic compounds (VOC) 6.57 tpy of VOC

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total VOC emission rate for all coatings and cleanup materials, in pounds per month;
 - e. the total number of days the emissions unit was in operation; and
 - f. the average daily total VOC emission rate for all coatings and cleanup materials, i.e. (d)/(e), in pounds per day (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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

1. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the average daily total VOC emissions exceeded 36.0 lbs/day, and the actual average daily total VOC emissions for each such month.

IV. Reporting Requirements (continued)

2. The deviation reports shall be submitted in accordance with the requirements in Part I - General Term and Condition B.2 of this permit.
3. The permittee shall submit annual reports which summarize the total VOC emissions (tons of VOC per year) during the calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

- 1.a Emission Limitation:

36.0 lbs/day of VOC
6.57 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements of section B.III.1 of this permit.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound content of the coatings and inks.

VI. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: naphtha

TLV (ug/m3): 1,370

Maximum Hourly Emission Rate (lbs/hr): 1.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 5.536

MAGLC (ug/m3): 32,619

2. 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

VI. Miscellaneous Requirements (continued)

- 3.** The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: ZZ515B (R106)

Activity Description: Race manual undertread tread cementing

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>
ZZ515B - race manual undertread cementing	OAC rule 3745-21-09(X)	exempt (see A.I.2.a)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the requirements of OAC rule 3745-21-09(X) because the operation produces specialty tires for antique or other vehicles on an irregular basis or with short production runs. The exemption applies only to tires produced on equipment separate from normal production lines for passenger-type tires.

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>
ZZ515B - race manual undertread cementing	OAC rule 3745-31-05 (PTI 16-351)	100 lbs/day of volatile organic compounds (VOC) 7.97 tpy of VOC

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total VOC emission rate for all coatings and cleanup materials, in pounds per month;
 - e. the total number of days the emissions unit was in operation; and
 - f. the average daily total VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per day (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall calculate and record on a yearly basis, for the coating operation, the VOC emission rate from all coatings and cleanup materials employed, in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the VOC emissions exceeded 100 lbs/day, and the actual average daily total VOC emissions for each such month.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition B.2 of this permit.
3. The permittee shall submit annual reports which summarize the total VOC emissions (tons of VOC per year) during the calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

1.a Emission Limitation:

100 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements of section B.III.1 of this permit.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

1.b Emission Limitation:

7.97 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements of section B.III.2 of this permit.

VI. Miscellaneous Requirements

None

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