

Facility ID: 1652100011 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 1652100011 Emissions Unit ID: P019 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. 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>
metal oxide varistor blocks coated with a glass-based mixture; employing spray guns, booth, conveyor, and delivery system; air emissions of particulate matter well-contained and vented to a fabric filter	OAC rule 3745-31-05 (A)(3) (PTI 16-02202)	5% opacity from any stack, as a 6-minute average 0.20 lb/hr and 0.88 tpy of particulate matter
	OAC rule 3745-17-07 OAC rule 3745-17-11	See sections A.2, B.1, and B.2 below for additional requirements of OAC rule 3745-31-05 (A)(3). The emissions limitations required by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- (a) The above hourly and yearly mass particulate matter emissions limitations (regulated per OAC rule 3745-31-05 (A)(3)) are greater than the controlled potential to emit for this emissions unit, as demonstrated below in section E.1.b. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emissions limitations. However, should compliance with these emissions limitations ever become suspect, then the permittee may be required to perform emissions testing, employing all applicable USEPA test methods, to establish accurate and representative emissions limitations for this emissions unit.
The permittee shall properly install, or have installed, adjust, operate, and maintain the fabric filter system (or comparable control device), enclosure, ductwork, fan, and any other equipment necessary to capture, contain, and vent air emissions of particulate matter to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.

B. Operational Restrictions

1. The fabric filter system serving this emissions unit shall be employed all times the emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the fabric filter serving this emissions unit shall be maintained within the range recommended by manufacturer, while the emissions unit is in operation. Operation of the fabric filter outside of this specified range is not necessarily indicative of an emissions violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigations to establish corrective action.

[Note: the pressure drop restriction shall not apply if the permittee evaluates fabric filter operating performance via visible particulate emissions monitoring/record keeping of the fabric filter system.]

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall document all times the fabric filter system serving this emissions unit was not employed when the emissions unit was in operation.
2. The permittee shall evaluate fabric filter operating performance via either of the two (2) methods listed below:
 - a. The permittee shall perform daily visible particulate emissions checks of the fabric filter system serving this emissions unit, while the emissions unit is in operation. The presence of any abnormal visible emissions from

the fabric filter system shall be noted in an operations log. If any abnormal visible emissions are observed from the system, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

- b. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter system serving this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. If visible particulate emissions monitoring/record keeping is used to evaluate fabric filter operating performance, the permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any abnormal visible particulate emissions were observed from the fabric filter system and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).
3. If pressure drop monitoring/record keeping is used to evaluate fabric filter operating performance, the permittee shall submit deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter serving this emissions unit did not comply with the allowable range specified above.
4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

E. Testing Requirements

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

- a. Emission Limitation: 5% opacity from any stack, as a 6-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation: 0.20 lb/hr and 0.88 tpy of particulate matter

Applicable Compliance Method: The above particulate matter emissions limitations are greater than the controlled potential to emit, as demonstrated in the equations below using a mass balance approach specified in the application:

$$E_h = MS(1 \text{ lb}/453.6 \text{ gms})(1 - T)(1 - B)(1 - F); \text{ and}$$

$$E_y = E_h(8760 \text{ hrs/yr})(1 \text{ ton}/2000 \text{ lbs})$$

Where,

E_h = 0.0044 lb/hr of PM [hourly controlled potential emissions];
 E_y = 0.019 tpy of PM [yearly controlled potential emissions];
 M = 748 metal oxide varistor blocks/hr [maximum process capacity];
 S = 92.9 gms of collar spray/48 metal oxide varistor blocks [process factor];
 T = 27.4 gms of collar spray coated/92.9 gms of collar spray [spray transfer efficiency];
 B = 52.8 gms of collar spray booth captured/65.5 gms collar spray not coated [booth mechanical capture efficiency]; and
 F = 0.99 [fabric filter control efficiency].

[Note: the mass balance approach specified in the application assumes no fugitive emissions.]

F. Miscellaneous Requirements

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

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

- (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. 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>
metal oxide varistor blocks faced with spray of molten aluminum; employing spray guns, booth, conveyor, and delivery system; air emissions of particulate matter well-contained and vented to a wet collector (identified by the manufacturer as a "Hydrostatic Precipitator")	OAC rule 3745-31-05 (A)(3) (PTI 16-02202)	5% opacity from any stack, as a 6-minute average 0.20 lb/hr and 0.88 tpy of particulate matter
	OAC rule 3745-17-07 OAC rule 3745-17-11	See sections A.2 and B.1 below for additional requirements of OAC rule 3745-31-05 (A)(3). The emissions limitations required by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- (a) The above hourly and yearly mass particulate matter emissions limitations (regulated per OAC rule 3745-31-05 (A)(3)) are greater than the controlled potential to emit for this emissions unit, as demonstrated below in section E.1.b. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emissions limitations. However, should compliance with these emissions limitations ever become suspect, then the permittee may be required to perform emissions testing, employing all applicable USEPA test methods, to establish accurate and representative emissions limitations for this emissions unit.
The permittee shall properly install, or have installed, adjust, operate, and maintain the wet collector system (or comparable control device), enclosure, ductwork, fan, and any other equipment necessary to capture, contain, and vent air emissions of particulate matter to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.

B. Operational Restrictions

- 1. The wet collector system serving this emissions unit shall be employed all times the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall document all times the wet collector system serving this emissions unit was not employed when the emissions unit was in operation.
- 2. The permittee shall perform daily visible particulate emissions checks of the wet collector system serving this emissions unit, while the emissions unit is in operation. The presence of any abnormal visible emissions from the wet collector system shall be noted in an operations log. If any abnormal visible emissions are observed from the system, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the wet collector system serving this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
- 2. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any abnormal visible particulate emissions were observed from the wet collector system and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 5% opacity from any stack, as a 6-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation: 0.20 lb/hr and 0.88 tpy of particulate matter

Applicable Compliance Method: The above particulate matter emissions limitations are greater than the controlled potential to emit, as demonstrated in the equations below using mass balance assumptions from similar operated sources, and company-specified wet collector control efficiency:

$$E_h = S(1 - T)(1 - B)(1 - F); \text{ and}$$

$$E_y = E_h(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds})$$

Where,

Eh = 0.044 lb/hr of PM [hourly controlled potential emissions];
 Ey = 0.19 tpy of PM [yearly controlled potential emissions];
 S = 3 lbs/hr of metallizer spray [maximum process capacity];
 T = 0.30 [assumed spray transfer efficiency];
 B = 0.30 [assumed booth mechanical capture efficiency]; and
 F = 0.97 [wet collector control efficiency].

[Note: the mass balance assumptions specified above assume no fugitive emissions.]

F. Miscellaneous Requirements

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

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Facility ID: 1652100011 Emissions Unit ID: P021 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. 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>
electrically-heated glass collar cure and binder burnout oven, air emissions of organic compounds (OCs) uncontrolled and vented to a stack	OAC rule 3745-31-05 (A)(3) (PTI 16-02209)	10.8 pounds/day & 1.97 tons/year of OCs
		The requirements of OAC rule 3745-31-05 (A)(3) also include compliance with all of the terms and conditions of this permit.

2. Additional Terms and Conditions

- (a) As determined from application data, the OC emissions limitations regulated per OAC rule 3745-31-05 (A)(3) are based upon accepted USEPA potential to emit procedures for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emissions limits. However, if any proposed change(s), such as with the materials processed, the maximum process weight rate capacity, or anything else that increase(s) the potential to emit of any pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s).

B. Operational Restrictions

1. The permittee shall use only electric to heat the oven, as designed by the manufacturer, and shall not modify the oven to accept any other type of heat source.

C. Monitoring and/or Record Keeping Requirements

1. None

D. Reporting Requirements

1. None

E. Testing Requirements

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

Emissions Limitations: 10.8 pounds/day & 1.97 tons/year of OCs

Applicable Compliance Method: The above OC emissions limitations are based upon the potential to emit, as demonstrated in the equations below using a mass balance approach specified in the application:

$E_d = PFO(24 \text{ hours/day})(2.205 \text{ pounds/kilogram})$; and
 $E_y = E_h(365 \text{ days/year})(1 \text{ ton}/2000 \text{ lbs})$

Where,

$E_d = 10.8 \text{ pounds/day}$ of OCs [daily potential emissions];
 $E_y = 1.97 \text{ tons/year}$ [yearly potential emissions];
 $P = 52 \text{ saggars}/53.5 \text{ hours}$ [maximum process rate capacity];
 $F = 14 \text{ kilograms}$ of bed material/sagger [process factor]; and
 $O = 0.015 \text{ kilogram}$ of OCs/kilogram of bed material [OC content].

F. Miscellaneous Requirements

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