



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

12/29/2011

Certified Mail

Mrs. Maura LaGreca  
Momentive Performance Materials Quartz, Inc.  
611 O'Neill Drive  
Hebron, OH 43025

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0145000213  
Permit Number: P0108757  
Permit Type: Initial Installation  
County: Licking

|     |                                    |
|-----|------------------------------------|
| No  | TOXIC REVIEW                       |
| No  | PSD                                |
| Yes | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No  | CEMS                               |
| No  | MACT/GACT                          |
| No  | NSPS                               |
| No  | NESHAPS                            |
| No  | NETTING                            |
| No  | MAJOR NON-ATTAINMENT               |
| No  | MODELING SUBMITTED                 |

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Newark Advocate. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*  
Ohio EPA-CDO



PUBLIC NOTICE  
12/29/2011 Issuance of Draft Air Pollution Permit-To-Install

Momentive Performance Materials Quartz, Inc.  
611 O'Neill Drive,  
Hebron, OH 43025  
Licking County  
FACILITY DESC.: Nonclay Refractory Manufacturing  
PERMIT #: P0108757  
PERMIT TYPE: Initial Installation  
PERMIT DESC: Initial installation of an R&D trial burner and rod straightener.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at:  
<http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Adam Novak, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The applicant, Momentive Performance Materials Quartz, Inc. (Facility ID No. 01-45-00-0213), has submitted a PTI application for the proposed installation of a rod straightener (B038) and two test burners (B039) vented to an SCR to be used for research into increasing production efficiency.

3. Facility Emissions and Attainment Status:

Momentive Performance Materials Quartz, Inc. is classified as a major source due to its emissions of nitrogen oxide (NO<sub>x</sub>). Without synthetic minor limitations presented in this permit, potential emissions from B038 and B039 would trigger New Source Review (NSR) permitting thresholds levels. The facility wide emissions from the SCR (tons per year), *with* synthetic minor limits, is 210.7 tons per year of NO<sub>x</sub>, and 388.3 tons per year of ammonia (NH<sub>3</sub>).

The ammonia is a by-product of NO<sub>x</sub> control. Emissions from B038 and B039 will be controlled by a reaction with ammonia in the selective catalytic reduction (SCR) pollution control equipment. Excess ammonia is used in the SCR which results in the emission of unreacted ammonia (ammonia slip).

Momentive Performance Materials Quartz, Inc. is located in Licking County. Currently, Licking County is attainment for all criteria pollutants *excluding* PM<sub>2.5</sub>. The facility manufactures fused quartz crucibles and glass tubing. The sources will be located at the following address:

611 O'Neill Drive SE  
Hebron, Ohio 43025

4. Source Emissions:

- Yearly potential *uncontrolled* NO<sub>x</sub> emissions from B038 and B039 are 37.4 and 58.1 tons per year respectively.
- Yearly potential *controlled* NO<sub>x</sub> emissions with a rolling, 12-month emission limitation from B038 and B039 combined is 39.0 tons per year.

5. Conclusion:

The installation of B038 and B029 is not a Major Modification because the applicant has limited the total yearly emissions on NO<sub>x</sub> from this group of emissions units to less than 40 tons per year. The reduction of yearly emissions will be achieved by the control efficiency of the pollution control equipment (SCR) in addition to typical operating procedures and personnel availability which will restrict operation to less than 8 hrs per day. The nitrogen oxide potential emissions of 95.2 tons per year are reduced to 39.0 tons per year with actual emissions likely less than 22.4 tons per year. Additionally, this permit maintains the current facility wide 210.7 tons per year NO<sub>x</sub> emission restriction. Therefore, the facility's potential NO<sub>x</sub> emissions will not increase as a result of the installation of B038 and B039.

The synthetic minor emission limit will effectively restrict the nitrogen oxide emissions below thresholds for a major modification. The operational restrictions, record keeping, reporting and testing requirements will ensure that compliance with this permit is achieved and maintained.

Please provide additional notes or comments as necessary:

None

6. Total Permit Allowable Emissions Summary (for informational purposes only):

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| <u>NOx</u>       | <u>39.0</u>          |
| <u>NH3</u>       | <u>15.1</u>          |



**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Momentive Performance Materials Quartz, Inc.**

|                |                                   |
|----------------|-----------------------------------|
| Facility ID:   | 0145000213                        |
| Permit Number: | P0108757                          |
| Permit Type:   | Initial Installation              |
| Issued:        | 12/29/2011                        |
| Effective:     | To be entered upon final issuance |





Division of Air Pollution Control
Permit-to-Install
for
Momentive Performance Materials Quartz, Inc.

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## Authorization

Facility ID: 0145000213  
Facility Description: Nonmetallic mineral products  
Application Number(s): A0041895  
Permit Number: P0108757  
Permit Description: Initial installation of an R&D trial burner and rod straightener.  
Permit Type: Initial Installation  
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 12/29/2011  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Momentive Performance Materials Quartz, Inc.  
611 O'Neill Drive  
Hebron, OH 43025

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0108757  
Permit Description: Initial installation of an R&D trial burner and rod straightener.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

|                                   |                   |
|-----------------------------------|-------------------|
| <b>Emissions Unit ID:</b>         | <b>B038</b>       |
| Company Equipment ID:             | Rod Straightener  |
| Superseded Permit Number:         |                   |
| General Permit Category and Type: | Not Applicable    |
| <b>Emissions Unit ID:</b>         | <b>B039</b>       |
| Company Equipment ID:             | Trial Burners (2) |
| Superseded Permit Number:         |                   |
| General Permit Category and Type: | Not Applicable    |



## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. 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 re-issuance, or modification.

- 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, 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 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.

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

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) 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, 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.
- 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:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

- (2) 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 made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. 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.
  - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office 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 shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.



- c) 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:
  - (1) 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.
  - (2) 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 ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office 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:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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.

**7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. 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.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. 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 (i.e., postmarked) quarterly, 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.)

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## 13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## 14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. 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.

**19. 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.

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) 2.a)(3), 4.f), 6.a)(3) and (4), 6.b)
2. Applicable Emissions Limitations and/or Control Requirements
  - a) Emission Limitations
    - (1) Pursuant to OAC rule 3745-31-05(D), total nitrogen oxides (NOx) emissions from the selective catalytic reduction (SCR) unit stack shall not exceed 210.7 tons per year for emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035, combined, as a rolling, 12-month summation of the NOx emissions.
    - (2) Pursuant to OAC rule 3745-17-07(A), visible particulate emissions (PE) from the SCR unit stack serving emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035 shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
    - (3) Ammonia emissions from the SCR unit stack shall not exceed 93.5 pounds per hour and 388.3 tons per year.

Ammonia is an air toxic, and the hourly emission limitation was established to reflect the status quo ammonia emission rate for this emissions unit for future air toxics evaluations that may involve this emissions unit.
  - b) Additional Terms and Conditions
    - (1) Except as set forth in 2.b)(11), the permittee shall control NOx emissions from emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035 by using a selective catalytic reduction (SCR) unit.
    - (2) The permittee shall control particulate emissions (PE) from the blockhouse enclosures of emissions units P010, P011, P012 and P035 by using an electrostatic precipitator (ESP).
    - (3) A continuous emissions monitoring system (CEMS) malfunction is defined as any time in which the CEMS system necessary for monitoring emissions in accordance with this permit is not able to sample or analyze the nitrogen oxides in the gas stream exiting the SCR unit.
    - (4) A SCR malfunction is defined as any time that the SCR automatically shuts down due to an internal control system setting. A SCR malfunction will also include instances where the permittee manually determines that the SCR is not operating properly and must be shut down. The malfunction event will begin at the time of automatic shutdown of the SCR (as recorded by the SCR control system) or at the time a malfunction requiring SCR shutdown is manually identified by the permittee.

- (5) Except as set forth in 2.b)(6), in the event of a CEMS malfunction, emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035 shall be shut down within one hour. Once the emissions unit(s) is (are) shut down, the emissions unit(s) shall remain shut down until the CEMS is no longer malfunctioning.
- (6) In order to continue to operate the above emissions units during or after a CEMS malfunction, the permittee may develop and submit for pre-approval by the Ohio EPA, CDO an alternative compliance method for estimating the emissions from B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035.
- (7) CEMS Quality Assurance/ Quality Control
- The permittee shall maintain a copy of the written quality assurance/quality control plan for the CEMS designed to ensure continuous valid and representative readings of NOx emissions in units of pounds per hour and tons per month. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the CEMS must be kept on site and available for inspection during regular office hours.
- (8) CEMS Statement of Certification
- The permittee shall maintain a copy of the certification of the continuous NOx monitoring system granted by the Ohio EPA, Central Office on June 27, 2002. This certification was granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(l) and 40 CFR Part 60, Appendix B, Performance Specification 2.
- (9) Except as set forth in 2.b)(11), in the event of an SCR malfunction, emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035 will be shut down immediately following completion of work-in-process. Work-in-process is defined as follows for each type of emissions unit:
- (a) production and repair lathes ( B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, P014, P015, P021, and P032) - The current lathe pass is a maximum of one hour of operation after SCR malfunction.
- (b) crucible machines (P010, P011, P012, P035) - The crucible being fused inside the blockhouse at the time of the SCR malfunction.
- (c) rod straightener (B038) – The rod being straightened at the time of the SCR malfunction for a maximum of one hour.



- (d) trial Burners (B039) - shall be shut down as soon as an SCR malfunction is identified.
(10) Except as set forth in 2.b)(11), in the event that the SCR catalyst has degraded to the point that it needs to be replaced, the permittee is still authorized to operate emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035 for up to 60 days provided the following conditions are met:
(a) the permittee has ordered replacement catalyst no later than 10 business days after the permittee has determined that the catalyst has irreversibly degraded below the acceptable activity level; and
(b) the permittee shall notify OEPA, CDO, DAPC within 5 business days upon determining the catalyst has irreversibly degraded; and
(e) emissions of NOx from the SCR do not exceed 210.7 tons on a rolling, 12-month period; and
(f) emissions of NOx for each emissions unit do not exceed the limits specified in the following table (These limits are based on the maximum hourly MMBtu demand and on the SCR operating at 50 % efficiency):

Table with 2 columns: Emissions Unit, NOx Emission Limit lbs/hr. Rows include units B001 through B032 with corresponding limits ranging from 20.0 to 25.0.



|      |      |
|------|------|
| B033 | 20.0 |
| B034 | 44.2 |
| B035 | 44.2 |
| B036 | 44.2 |
| B037 | 44.2 |
| B038 | 4.2  |
| B039 | 6.6  |
| P010 | 15.0 |
| P011 | 12.0 |
| P012 | 22.3 |
| P014 | 28.0 |
| P015 | 28.0 |
| P021 | 3.3  |
| P032 | 20.0 |
| P035 | 22.3 |

(11) During the period from October 1 to April 30, the permittee is not subject to the SCR operation requirements in 2.b)(1, 9, and 10).

3. Operational Restrictions

None

4. Monitoring and Record Keeping Requirements

- a) The permittee shall maintain monthly records of the tons of NOx per month and of the rolling, 12-month NOx emissions calculated as the summation of the NOx emissions as determined by the CEMS (Section B.4.c) and the NOx emissions from the CEMS malfunctions (Section B.4.d).
- b) The permittee shall operate and maintain the CEMS to continuously monitor and record combined NOx emissions from emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
- c) The permittee shall maintain records of all data obtained by the CEMS including emissions of NOx in units of pounds per hour and tons per month, results of daily zero/span calibration checks and magnitude of manual calibration adjustments.

d) The permittee shall collect and record the following information for a CEMS malfunction:

- (1) The number of lathes operating.
- (2) The emissions unit ID for each arc fusion machine in operation.
- (3) The total duration of the CEMS malfunction, in hours.
- (4) The estimated NOx emissions from the lathes in operation calculated by multiplying the lathes in operation in Section B.4.d)(1), by the total hours of the CEMS malfunction in Section B.4.d)(3), by the maximum allowable emission rate for each lathe of **X**lbsNOx/hr when the SCR is in operation and **Y**lbsNOx/hr when the SCR is not in operation.

| Source | X<br>Controlled<br>NOxlb/hr | Y Uncontrolled<br>NOxlb/hr |
|--------|-----------------------------|----------------------------|
| B001   | 14.0                        | 45.6                       |
| B002   | 14.0                        | 45.6                       |
| B003   | 14.0                        | 45.6                       |
| B006   | 14.0                        | 45.6                       |
| B023   | 12.0                        | 39.2                       |
| B024   | 12.0                        | 39.2                       |
| B025   | 12.0                        | 39.2                       |
| B026   | 12.0                        | 39.2                       |
| B027   | 12.0                        | 39.2                       |
| B028   | 12.0                        | 39.2                       |
| B029   | 12.0                        | 39.2                       |
| B030   | 15.0                        | 49.0                       |
| B031   | 12.0                        | 39.2                       |
| B032   | 12.0                        | 39.2                       |
| B033   | 12.0                        | 39.2                       |
| B034   | 26.5                        | 88.5                       |
| B035   | 26.5                        | 88.5                       |
| B036   | 26.5                        | 88.5                       |
| B037   | 26.5                        | 88.5                       |
| P014   | 17.0                        | 55.0                       |
| P015   | 17.0                        | 55.0                       |
| P021   | 2.0                         | 6.6                        |
| P032   | 12.0                        | 39.2                       |

- (5) The estimated NOx emissions from the arc fusion machines\* calculated using the following equation:

{arc fusion machine #4 (P010) \* 9.11lbs/hr when the SCR is in operation or 29.78lbs/hr when the SCR is not in operation} + {arc fusion machine #5 (P011) \* 7.2 lbs/hr when the SCR is in operation or 23.9 lbs/hr when the SCR is not in operation} + {arc fusion machine #8 (P012) \* 14.0 lbs/hr when the SCR is in operation or 44.49 lbs/hr when the SCR is not in operation} + {arc fusion machine #9 (P035) \* 14.0 lbs/hr when the SCR is in operation or 44.49 lbs/hr when the SCR is not in operation}.

\* If an arc fusion machine is not in operation at the time of the CEMS malfunction then its emissions are assumed to be zero.

- (6) The estimated NOx emissions from the trial burners and rod straightener using the following equation:

{ (total hours the rod straightener (B038) was operated during the CEMS malfunction \* 2.6 lbs/hr when the SCR is in operation or 8.5 lbs/hr when the SCR is not in operation) + (total hours the trial burners were operated during the CEMS malfunction \* 4.0 lbs/hr when the SCR is in operation or 13.3 lbs/hr when the SCR is not in operation)}

- (7) The summation of the NOx emissions from the lathes, arc fusion machines, trial burners and rod straightener in lbs.

- e) The permittee shall perform checks once each operating day, when the plant is operating, using either certified or non-certified visible emissions observers, when any of the emissions units identified in Section B.2.a)(2) are in operation and when the weather conditions allow, for any visible particulate emissions from the SCR unit stack serving these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- (1) the color of the emissions;
- (2) whether the emissions are representative of normal conditions;
- (3) if the emissions are not representative of normal conditions, the cause(s) of the abnormal emissions;
- (4) the total duration of any visible emission incident; and
- (5) any corrective actions taken to eliminate the visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emission limitation and/or visible emission limitation. If required, compliance with the particulate mass emission limitation and the visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions observations, using USEPA approved methods and procedures. The results of any required mass emission tests and visible emissions observations shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible emission limitation and/or visible emission limitation.

If the daily checks show visible emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when any of the emissions units identified in Section B.2.a)(2) are in operation). If a subsequent check indicates abnormal visible emissions, the frequency of

emissions checks shall revert to once each operating day until such time as there are 30 consecutive operating days of normal visible emissions.

f) Air Toxics Language

The PTI application for the SCR unit stack, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";  
or

STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Ammonia

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

Maximum Hourly Emission Rate (lbs/hr): 93.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 171.09

MAGLC (ug/m<sup>3</sup>): 404.8

The permittee, has demonstrated that emissions of ammonia, from the SCR unit stack, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

## 5. Reporting Requirements

- a) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month NO<sub>x</sub> emission limitation for emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035, combined.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part A.4.c).

- b) CEMS Data Reporting

The permittee must submit data for each CEMS (that meets the requirements of 40 CFR Part 60.13 and has received certification from Ohio EPA) to Ohio EPA, Central Office on a quarterly basis. The data presented in the quarterly reports shall reflect emissions unit operations, monitoring availability, actual tons of NO<sub>x</sub>, and excess NO<sub>x</sub> emissions in units of pounds per hour and rolling, 12-month limitation (in tons) for the previous calendar quarter.

The permittee shall submit reports within one month following the end of each calendar quarter to the Ohio EPA, CDO documenting any CEMS 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 also 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 date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

c) CEMS Electronic Data Reporting, Summary Form

Pursuant to OAC rule 3745-15-04 and ORC sections 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Ohio EPA, CDO within the schedule required in Part A.4.c) of this PTI.

d) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to Ohio EPA, CDO by January 31 and July 31 of each year and shall cover the previous 6-month period.

6. Testing Requirements

a) Compliance with the emission limitations in Section B.2.a) of these terms and conditions shall be determined in accordance with the following methods:

(1) Emission Limitation:

210.7 tons per year NOx emissions from the SCR unit stack for emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035, combined, as a rolling, 12-month summation of the NOx emissions.

Applicable Compliance Method:

Compliance shall be based on the record keeping in Section B.4.a)-d).

(2) Emission Limitation:

Visible particulate emissions (PE) from the SCR unit stack serving emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035 shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07.



Applicable Compliance Method:

Compliance shall be based on the record keeping in Section B.4.e).

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

(3) Emission Limitation:

Ammonia emissions from the SCR unit stack shall not exceed 93.5 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in term b) which follows.

(4) Emission Limitation:

Ammonia emissions from the SCR unit stack shall not exceed 388.3 tons per year.

Applicable Compliance Method:

Compliance with the annual emission limitation for ammonia shall be assumed provided compliance is maintained with the pound per hour emission limitation for ammonia. The annual limitation was calculated by multiplying the hourly limitation by 8760 hours per year and dividing by 2000 pounds per ton.

b) The permittee shall conduct, or have conducted, emission testing for the SCR unit in accordance with the following requirements:

- (1) The emission testing shall be conducted in accordance with the schedule dictated by Momentive performance Materials Quartz, Inc.'s Title V Permit.
- (2) The emission testing shall be conducted to demonstrate compliance with the hourly emission limitation for ammonia.
- (3) The following test methods shall be employed to demonstrate compliance with the ammonia emission limitation: 40 CFR Part 60, Appendix A, Methods 1 - 4 and Conditional Test Method 027. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, CDO.
- (4) The tests shall be conducted while all emissions units venting to the SCR unit are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, CDO.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, CDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, CDO's refusal to accept the emissions tests.



Personnel from the Ohio EPA, CDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

c) Relative Accuracy Test Audit

To ensure the validity of the data from the CEMS, the permittee shall certify the accuracy of the CEMS annually pursuant to provisions for a relative accuracy test audit (RATA) in 40 CFR Part 60, Appendix F.

## C. Emissions Unit Terms and Conditions



1. B038, Rod Straightener

Operations, Property and/or Equipment Description:

Rod Straightener

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
(1) None.
b) Applicable Emissions Limitations and/or Control Requirements
(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: ORC 3704.03(T) with NOx emission limits. Row b: OAC rule 3745-31-05(D) with total NOx emissions for multiple units.



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row c: OAC rule 3745-17-07(A)(1), See 1.b)(2)b. below.

(2) Additional Terms and Conditions

- a. The NOx pounds per hour limitation for this emissions unit was established to reflect the potential to emit for the unit after control for the time period of May1 to September 30. For the remainder of the year, the NOx pound per hour limitation for the emissions unit was established to reflect the potential to emit for the unit without control. Therefore, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these emission limitations.
b. Visible PE from the SCR stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

c) Operational Restrictions

- (1) Except as set forth in B. Facility-Wide Terms and Conditions Section 2.b)(11), the permittee shall operate the SCR during any operation of this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the natural gas usage (mmscf) by emissions units B038 and B039 combined.
(2) The permittee shall maintain daily records of the hours when emissions units B038 and B039 were operated.
(3) The permittee shall calculate emissions of NOx each day from emissions units B038 and B039 combined from the natural gas usage and SCR efficiency data as follows:

NOx emissions rate = natural gas usage (mmscf/day) x 1050 mmbtu/mmscf x 7.77lb/mmbtu x (1 – daily average SCR control efficiency as determined in d)(6) when SCR is in operation).

- (4) The permittee shall calculate monthly emissions of NOx from emissions units B038 and B039 combined by summing the individual daily emissions calculated in d)(3) for all hours of operation in the month. The permittee shall also calculate the rolling, 12-month NOx emissions from emissions units B038 and B039 combined.
(5) For monitoring and record keeping requirements for the visible PE limitation from the SCR unit stack, see Part B. – Facility-Wide Terms and Conditions, Section 4.e).
(6) During the period of May 1 to September 30, for monitoring and record keeping requirements for the hourly NOx emission limitation, the permittee shall collect and record the rolling, 3-hour average of the NOx destruction efficiency of the SCR. The

efficiency shall be based upon data obtained from the SCR inlet analyzer and the outlet CEMS.

- (7) During the period of May 1 to September 30, for each 3-hour period when the NO<sub>x</sub> destruction efficiency is less than 70%, the permittee shall note the following in the operations log:
- a. the 3-hour average NO<sub>x</sub> destruction efficiency;
  - b. the hours included in the 3-hour period;
  - c. for each hour within the period, the production lathes, repair lathes, arc fusion machines, trial burners, and rod straighteners that were operating;
  - d. for each hour within the period, the sum of the hourly NO<sub>x</sub> emissions limitations for the production lathes, repair lathes, arc fusion machines, trial burners, and rod straighteners that were operating;
  - e. for each hour within the period, the NO<sub>x</sub> emissions in pounds per hour measured by the SCR outlet CEMS; and
  - f. for each hour within the period, whether the value for (e) exceeds the value for (d), above

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) For reporting requirements for the rolling, 12-month NO<sub>x</sub> emission limitation, see Part B. – Facility-Wide Terms and Conditions, Section 5.a).
- (3) For reporting requirements for the visible PE limitation from the SCR unit stack, see Part B. – Facility-Wide Terms and Conditions, Section 5.d).
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of:
  - a. the hourly NO<sub>x</sub> emission limitation based on the records required by Section 1.d)(7)f. above; and
  - b. the rolling, 12-month NO<sub>x</sub> emission limitation for emissions units B038 and B039 combined.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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



- a. Emission Limitation:  
NOx emissions from the SCR unit stack shall not exceed 2.6 pounds per hour for B038 from May 1 to September 30 and 8.5 pounds per hour from October 1 to April 30.

Applicable Compliance Method:

The emission limitation was established by the following equation:

Emission limitation (EL) =  $[(1.1 \text{ MMBtu/hr})^* \times (7.77 \text{ lbs of NOx/MMBtu})^{**} \times (\text{CE})^{***}]$  where;

CE = 0.30 for calculations from May 1 to September 30 and 1.0 for calculations from October 1 to April 30.

\* Maximum hourly gas usage.

\*\* The emission factor was established through emission tests performed by GE Quartz, Inc.

\*\*\* The control efficiency of the SCR unit is assumed to be 70% for the purpose of this calculation.

Compliance with this limitation may be demonstrated by showing that the rolling, 3-hour average SCR destruction efficiency is equal to or greater than 70%.

During the period of May 1 to September 30, if the rolling, 3-hour average SCR destruction efficiency is less than 70%, compliance with this emission limitation shall be demonstrated by showing that the NOx emission rate determined in Section 1.d)(7)e. is less than or equal to the emission limitation determined in Section 1.d)(7)d.

If required by the Ohio EPA and/or U.S. EPA, compliance shall be demonstrated through emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

- b. Emission Limitation:  
210.7 tons per year of NOx from the SCR unit stack serving emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035, combined, as a rolling, 12-month summation of the NOx emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation as described in Part B – Facility-Wide Terms and Conditions, Section 6.a).

- c. Emission Limitation:  
39.0 tons per year of NOx from emissions units B038 and B039 combined, as a rolling 12-month summation of the NOx emissions.



Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation based on the record keeping required in section 1.d)(4).

d. Emission Limitation:

Visible PE from any stack serving these emissions units shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation as described in Part B – Facility-Wide Terms and Conditions, Section 6.a)(2).

g) Miscellaneous Requirements

(1) None.



2. B039, Trial Burners (2)

Operations, Property and/or Equipment Description:

Trial Burners

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
(1) None.
b) Applicable Emissions Limitations and/or Control Requirements
(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row a: ORC 3704.03(T), requirements for SCR unit stack emissions. Row b: OAC rule 3745-31-05(D), total NOx emissions for various units.



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row c: OAC rule 3745-17-07(A)(1), See 1.b)(2)b. below.

(2) Additional Terms and Conditions

- a. The NOx pounds per hour limitation for this emissions unit was established to reflect the potential to emit for the unit after control for the time period of May1 to September 30. For the remainder of the year, the NOx pound per hour limitation for the emissions unit was established to reflect the potential to emit for the unit without control. Therefore, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these emission limitations.
b. Visible PE from the SCR stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

c) Operational Restrictions

- (1) Except as set forth in B. Facility-Wide Terms and Conditions Section 2.b)(11), the permittee shall operate the SCR during any operation of this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the natural gas usage (mmscf) by emissions units B038 and B039 combined.
(2) The permittee shall maintain daily records of the hours when emissions units B038 and B039 were operated.
(3) The permittee shall calculate emissions of NOx each day from emissions units B038 and B039 combined from the natural gas usage and SCR efficiency data as follows:

NOx emissions rate = natural gas usage (mmscf/day) x 1050 mmbtu/mmscf x 7.77lb/mmbtu x (1 – daily average SCR control efficiency as determined in d)(6) when SCR is in operation).

- (4) The permittee shall calculate monthly emissions of NOx from emissions units B038 and B039 combined by summing the individual daily emissions calculated in d)(3) for all hours of operation in the month. The permittee shall also calculate the rolling, 12-month NOx emissions from emissions units B038 and B039 combined.
(5) For monitoring and record keeping requirements for the visible PE limitation from the SCR unit stack, see Part B. – Facility-Wide Terms and Conditions, Section 4.e).
(6) During the period of May 1 to September 30, for monitoring and record keeping requirements for the hourly NOx emission limitation, the permittee shall collect and record the rolling, 3-hour average of the NOx destruction efficiency of the SCR. The



efficiency shall be based upon data obtained from the SCR inlet analyzer and the outlet CEMS.

- (7) During the period of May 1 to September 30, for each 3-hour period when the NOx destruction efficiency is less than 70%, the permittee shall note the following in the operations log:
  - a. the 3-hour average NOx destruction efficiency;
  - b. the hours included in the 3-hour period;
  - c. for each hour within the period, the production lathes, repair lathes, arc fusion machines, trial burners, and rod straighteners that were operating;
  - d. for each hour within the period, the sum of the hourly NOx emissions limitations for the production lathes, repair lathes, arc fusion machines, trial burners, and rod straighteners that were operating;
  - e. for each hour within the period, the NOx emissions in pounds per hour measured by the SCR outlet CEMS; and
  - f. for each hour within the period, whether the value for (e) exceeds the value for (d), above

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) For reporting requirements for the rolling, 12-month NOx emission limitation, see Part B. – Facility-Wide Terms and Conditions, Section 5.a).
- (3) For reporting requirements for the visible PE limitation from the SCR unit stack, see Part B. – Facility-Wide Terms and Conditions, Section 5.d).
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of:
  - a. the hourly NOx emission limitation based on the records required by Section 1.d)(7)f. above; and
  - b. the rolling, 12-month NOx emission limitation for emissions units B038 and B039 combined.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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



- a. Emission Limitation:  
NOx emissions from the SCR unit stack shall not exceed 4.0 pounds per hour for B039 from May 1 to September 30 and 13.3 pounds per hour from October 1 to April 30.

Applicable Compliance Method:

The emission limitation was established by the following equation:

Emission limitation (EL) =  $[(1.71 \text{ MMBtu/hr})^* \times (7.77 \text{ lbs of NOx/MMBtu})^{**} \times (\text{CE})^{***}]$  where;

CE = 0.30 for calculations from May 1 to September 30 and 1.0 for calculations from October 1 to April 30.

\* Maximum hourly gas usage.

\*\* The emission factor was established through emission tests performed by GE Quartz, Inc.

\*\*\* The control efficiency of the SCR unit is assumed to be 70% for the purpose of this calculation.

Compliance with this limitation may be demonstrated by showing that the rolling, 3-hour average SCR destruction efficiency is equal to or greater than 70%.

During the period of May 1 to September 30, if the rolling, 3-hour average SCR destruction efficiency is less than 70%, compliance with this emission limitation shall be demonstrated by showing that the NOx emission rate determined in Section 1.d)(3)e. is less than or equal to the emission limitation determined in Section 1.d)(3)d.

If required by the Ohio EPA and/or U.S. EPA, compliance shall be demonstrated through emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

- b. Emission Limitation:  
210.7 tons per year of NOx from the SCR unit stack serving emissions units B001, B002, B003, B006, B023, B024, B025, B026, B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, P010, P011, P012, P014, P015, P021, P032, and P035, combined, as a rolling, 12-month summation of the NOx emissions.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation as described in Part B – Facility-Wide Terms and Conditions, Section 6.a).

- c. Emission Limitation:  
39.0 tons per year of NOx from emissions units B038 and B039 combined, as a rolling 12-month summation of the NOx emissions.



Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation based on the record keeping required in section 1.d)(4).

d. Emission Limitation:

Visible PE from any stack serving these emissions units shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation as described in Part B – Facility-Wide Terms and Conditions, Section 6.a)(2).

g) Miscellaneous Requirements

(1) None.