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Facility Name: **Federal-Mogul Ignition Products Tech Ctr**

Application Number: **04-1161**

Date: **Draft PTI (Date will be entered upon final issuance)**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

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Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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The air contaminant emissions units listed below comprise the Permit to Install for **Federal-Mogul Ignition Products Tech Ctr** located in **Lucas** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P075	Engine cold test cell with 250 hp dynamometer and no controls	compliance with AP-42 emissions levels	3745-31-05	no visible emissions from the stack, 1.8 pounds of carbon monoxide (CO) per hour, 8.0 tons of CO per year, 0.05 pound of nitrogen oxides (NO _x) per hour, 0.20 ton of NO _x per year, 0.003 pound of particulate matter (PM) per hour, 0.01 ton of PM per year, 0.002 pound of sulfur dioxide (SO ₂) per hour, 0.01 ton of SO ₂ per year, 0.09 pound of volatile organic compounds (VOC) per hour, and 0.40 ton of VOC per year.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P075 cont'd			*3745-17-07 (A)(1)	See below
			*3745-17-11 (B)(4)	See below
			*3745-18-06 (B)	See below
			*3745-21-07 (B)	See below
			*3745-21-08 (B)	See below
			*3745-23-06 (B)(1)	See below

* The emission limitation established by this applicable rule is equivalent to or less stringent than the emission limitation established through the best available technology determination of OAC rule 3745-31-05.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
CO	8.0
NO _x	0.20
PM	0.01
SO ₂	0.01
VOC	0.40

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CONSTRUCTION STATUS

The **Toledo Environmental Services Division** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **P075**.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Toledo Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602**.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Toledo Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Additional terms and conditions

None

B. Operational Restrictions

1. The permittee shall restrict the operation of this emission unit to 35,000 horsepower-hours per rolling 12-month period.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed a summation of the operational horsepower-hours level specified in the following table:

Month	Maximum Allowable Horsepower-Hours	Cumulative
1	3,000	
1-2	6,000	
1-3	9,000	
1-4	12,000	
1-5	15,000	
1-6	18,000	
1-7	21,000	
1-8	24,000	
1-9	27,000	
1-10	30,000	
1-11	33,000	
1-12	35,000	

After the first 12 calendar months of operation following the issuance of this permit, compliance with the operational horsepower-hours limitation shall be based upon a rolling 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day the emissions unit is operated:

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- a. the vehicle identification number of each vehicle employed;
 - b. the manufacturer's horsepower rating of the engine tested (bhp); and,
 - c. the duration of time that the emissions unit was operational (hours).
2. The permittee shall collect and record the following information for each month:

The rolling 12-month horsepower-hour summation, i.e., the summation of the values recorded for Section C.1.b. multiplied by the values recorded for Section C.1.c.

D. Reporting Requirements

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any monthly record showing that the rolling 12-month horsepower-hour summation exceeds the applicable maximum horsepower-hour limit.
2. 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 emissions limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable causes of such deviations, and (c) any corrective actions or preventative measures that have been or will be taken, shall be submitted to the Toledo Division of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 30, 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.

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E. Testing Requirements

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):

a. Emissions Limitation - no visible emissions from the stack.

Applicable Compliance Method - If required, the permittee shall demonstrate compliance with this emissions limitation through visible emissions observations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).

b. Emissions Limitation - 1.8 pounds of carbon monoxide (CO) per hour.

Applicable Compliance Method - If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A.

c. Emissions Limitation - 8.0 tons of CO per year.

Applicable Compliance Method - Compliance shall be determined through the monitoring and recordkeeping requirements of Section C. and an emissions factor of 0.439 pound of carbon monoxide per horsepower-hr based on the USEPA guidance document AP-42, Table 3.3-1 dated 10/96.

d. Emissions Limitation - 0.05 pound of nitrogen oxides (NO_x) per hour.

Applicable Compliance Method - If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with the methods and procedures specified in Method 7 of 40 CFR Part 60, Appendix A.

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- e. Emissions Limitation - 0.20 ton of NO_x per year.

Applicable Compliance Method - Compliance shall be determined through the monitoring and recordkeeping requirements of Section C. and an emissions factor of 0.0.011 pound of nitrogen oxides per horsepower-hr based on the USEPA guidance document AP-42, Table 3.3-1 dated 10/96.

- f. Emissions Limitation - 0.003 pound of particulate matter (PM) per hour.

Applicable Compliance Method - If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

- g. Emissions Limitation - 0.01 ton of PM per year.

Applicable Compliance Method - Compliance shall be determined through the monitoring and recordkeeping requirements of Section 3. and an emissions factor of 0.000721 pound of particulate matter per horsepower-hr based on the USEPA guidance document AP-42, Table 3.3-1 dated 10/96.

- h. Emissions Limitation - 0.002 pound of sulfur dioxide (SO₂) per hour.

Applicable Compliance Method - If required the permittee shall demonstrate compliance with this emissions limitation in accordance with the methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A.

- i. Emissions Limitation - 0.01 ton of SO₂ per year.

Applicable Compliance Method - Compliance shall be determined through the monitoring and recordkeeping requirements of Section 3. and an emissions factor of 0.000591 pound of sulfur dioxide per horsepower-hr based on the USEPA guidance document AP-42, Table 3.3-1 dated 10/96.

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- j Emissions Limitation - 0.09 pound of volatile organic compounds (VOC) per hour.

Applicable Compliance Method - If required the permittee shall demonstrate compliance with this emissions limitation in accordance with the methods and procedures specified in Method 25 of 40 CFR Part 60, Appendix A.

- k. Emissions Limitation - 0.40 ton of VOC per year.

Applicable Compliance Method - Compliance shall be determined through the monitoring and recordkeeping requirements of Section 3. and an emissions factor of 0.022 pound of volatile organic compounds per horsepower-hr based on the USEPA guidance document AP-42, Table 3.3-1 dated 10/96.

F. Miscellaneous Requirements

None